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

Proof of Evidence of John Hatton, BALPA
Staff Car Parking

Ref: BALPA W/1/1

June 2021

Qualifications and Experience

1. I am a retired airline captain having spent 16 years flying in the Fleet Air Arm followed by 27 years in commercial aviation. I was an elected representative of the British Airline Pilot's Association for 8 years with 3 of those in the role of chairman of my airline committee. I retired in September 2020 but still serve the association as a custodian trustee. I confirm that the evidence which I have prepared for this appeal in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions.

Introduction

- 2. In this proof of evidence, I will:
- explain the car parking arrangements for staff at Bristol Airport, both historically and since October 2018, when the staff car parking was moved to the Silver Zone within the Southern Area.
- quantify the additional number of passenger cars that could be parked in the staff
 parking area in the Silver Zone if this was replaced by the block parking of Silver Zone
 passenger cars.
- demonstrate that there was spare capacity in the multi storey car park after the first phase of it had been completed in 2018, such that some, if not all, of the staff car parking could be accommodated within the multi storey car park (even before MSCP2, which already has permission, is constructed, let alone MSCP3).
- present information which suggests, in lieu of any evidence to the contrary, that moving staff car parking from the Silver Zone to northside would not have additional cost to the airport.

- demonstrate that the move of the staff car parking from the northern zone next to the airport terminal to the Silver Zone has had the result of increasing bus and staff mileage.
- 3. A central concern of BALPA is that the staff parking arrangements, which would be continued under the current proposals, give rise to health and safety implications for aircrew due to the effect the extended travel time has on the aircrew's rest periods. This is a matter on which I touch briefly, but which is addressed primarily by Simon Williams.
- 4. Mr Andrew Renshaw, a chartered town planner, addresses the planning implications of the issues raised by Mr Williams and me.

Staff car parking arrangements

- 5. From the beginning of commercial operations in 1957 until October 2018 all airline staff and most northside workers parked northside, near to the Old Terminal Building. A new terminal building was opened in 2000, but the old building remained in use for airport administration and airline staff. Since at least 2000, staff parking was located directly in front of the building and offices were a one minute walk away from the furthest point in the car park.
- 6. In early 2018 BALPA representatives at Bristol Airport discovered that the airport management intended to expand the aircraft passenger parking capacity and would use the area occupied at that time by a staff car park (682 spaces) situated adjacent to the Old Terminal Building. In order to achieve this, Bristol Airport Ltd (BAL) submitted a consultation to North Somerset Council in respect of permitted development for a building to house a staff waiting area, as well as to reconfiguration of access roads in order to commission a new staff car park (1000 spaces) in the Green Belt on the South side of the airport. This involved converting an area utilised at that time by 'Silver Zone

- Parking' (A long stay valet parking operation where passengers' cars are re-positioned into densely parked columns, bumper to bumper).
- 7. BALPA and UNITE representing respectively pilots and cabin crew based at Bristol conducted surveys of their members who strongly supported action to resist the staff car park move. Therefore BALPA and UNITE submitted an objection to the application (Appendix C). Survey results are included at Appendices A and B
- Notwithstanding these concerns, BAL implemented the changes to the staff parking arrangements in late 2018.
- 9. From October 2018 to March 2020, airline staff and most other northside workers were required to park in the southside staff car park situated in the Silver Zone passenger car parking area, within the green belt.
- 10. Parking in the southside staff car park requires the majority of staff, and all aircrew, to wait for a bus to transfer them to a terminal northside. The transfer takes approximately 7 minutes. Before the current situation, buses used to run every 10 minutes at peak times, reverting to a less frequent service late at night. Crew report times do not take the bus timetable into account, hence crew can be forced to aim for a bus which will get them to work too early. The same problem arises at the end of the working day, so crews often endure a frustrating wait, especially after returning from a long day, in the small hours when buses run less frequently.
- 11. In addition, as will be explained in greater detail below, the change in staff parking arrangements requires the majority of staff to drive further to work, past the terminal building, only then to be bussed back the way they have come.
- 12. Since flying resumed following the spring 2020 Covid lockdown, airline staff and other northside workers have been parking northside, variously in the Multi Story Car Park

(MSCP) and former car hire area, both a 5 minute walk to the place of work and within the green belt inset. This is understood to be a temporary arrangement during the current pandemic, and is not an arrangement that its currently proposed in the application under consideration.

Availability of parking in staff car park during peak times

13. Peak times in the staff car park are from late morning until mid afternoon when some crew have still not returned from their morning flights but afternoon/evening crew are arriving for work. When the southside staff car park was in operation, there was insufficient space requiring the airport to open an overflow area between the staff car park and the general aviation apron. The situation was worsened by the loss of further spaces during 2019 when a significant area was lost due to the construction of the new admin building and a road re-alignment.

Difference between self-park and block parking

- 14. Attached at **Appendix D** is a map showing the parking spaces in the main section of the staff car park located in the green belt. It can be seen that a large area is given over to access 'aisles', one access aisle is required for every two parking spaces, with spaces normally 2.4 x 4.8 metres in size. For obvious reasons, this arrangement is necessary in order that the vehicles in the staff car park can be self-parked.
- 15. Apart from an 'arrivals and departures area' where passengers deposit and recover their vehicles, the remainder of the Silver Zone parking is configured for block parking. Cars are valet parked in blocks, bumper to bumper, and therefore far less space is required per vehicle than in the staff parking area,

- 16. Measuring the spaces and aisles it can be seen that each aisle is equal in length to approximately 1.33 standard bays this makes sense so that cars can be safely manoeuvred into and out of spaces. Removal of three aisles (leaving one for block parking access) means that in contrast to each column in the staff car park accommodating 8 cars, a further 4 cars could be parked (1.33x3), making a total of 12 cars which could be parked per column were the area to be used for block parking, a 50% increase.
- 17. In addition, the area currently used for the staff waiting building and bus turning circle would account for more lost spaces, perhaps an additional 50, were the area to be used for block parking.
- 18. It follows, that in my view, an additional 40% parking capacity could easily be achieved were the staff car park to revert to Silver Zone parking.

BALPA survey of spare capacity northside MSCP

- 19. In order to identify whether there was a realistic alternative to the current parking arrangements, BALPA monitored usage of the Multi Story Car Park (984 spaces at the time) during the summer of 2018. There was significant spare capacity from the commissioning in late May until early August when the survey ceased (see attached spreadsheet at **Appendix I**).
- 20. There was an average of 458 empty spaces in June and 540 empty spaces in July. The MSCP was only 45-53% occupied over these two months.
- 21. In July 2018 a price promotion was launched initially offering 20% and then 25% off, taking prices below the cost of parking in the northside long stay car park, (with a resulting reduction in empty spaces in August). This data indicates that the market will not support the prices BAL would like to charge for parking in the MSCP. Indeed, BAL

- obtained permission to delay building MSCP's, varying the conditions of planning permission, pleading lack of demand.
- 22. BALPA suggest that were BAL to build MSCPs as per the original planning permission before the Silver Zone car parking is extended, additional capacity would be created northside enabling some of this capacity to be allocated to relocated staff parking, and thus reducing the pressure to extend the Silver Zone car parking in the green belt.

<u>Cost implications to BAL – BALPA survey comparing parking prices in</u> <u>Silver Zone and northside car parks</u>

- 23. A BALPA analysis of BAL parking prices during the summer of 2018 indicates that the price charged for northside long stay parking was 1.4x the price charged in the silver zone long stay car park (see attached spreadsheet at **Appendix J**). It has been argued above that **at least** 1.4 (40%) more cars could be block parked in the Silver Zone were the staff car park area to be reverted to public parking. However, this ratio shows there is no difference in the parking revenue potentially lost to BAL when comparing staff parking in the northside car park and staff parking in an area that could otherwise be used for Silver Zone block parking.
- 24. It would appear, therefore, that under the pricing structure in place before the Covid pandemic, there would be no loss of revenue were staff to be parked in the northside long stay car park. This ignores the financial cost of running the staff buses.
- 25. It has further been demonstrated that the market has not previously supported MSCP prices being more expensive than long stay.

Parking Requirements for Aircrew

- 26. The airport currently has 36 overnight aircraft parking stands. Generally speaking all based aircraft depart to various destinations between 0600 and 0900. Most based aircraft need a crew of 6 people (2 pilots and 4 cabin crew), therefore assuming all will arrive at work by single occupancy vehicle (a few do use the airport flyer bus), 36x6 car park spaces are needed to cover the potential first wave of departures, ie 216 spaces. When an aircraft changes crew there will be an overlap, so again assuming the worst case, 432 spaces would be required to cover the shift change. In reality fewer spaces would be required because crew changes do not all happen at the same time, but over the late morning/afternoon 4-5 hour period. Airline office staff will also need to catered for, but it is unlikely to exceed 20 people for easyJet, TUI, Ryanair and Jet2. Allowing for 10% travelling other than by single occupancy vehicle, circa 400 spaces are required for airline crew and office staff (nearly all of whom also occasionally fly as crew).
- 27. It is BALPA's view that, for health and safety reasons (addressed by Mr Williams), the proposal should only be permitted if <u>at least</u> 400 spaces in the northern area of the Airport, within the green belt inset, and in close proximity to the terminal, are secured for airline crew and related office staff. This is in addition to the Green Belt reasons (addressed by Mr Renshaw) for locating the vast majority of staff car parking with the green belt inset.

Implications of location – additional bus and additional staff mileage

- 28. The relocation of the staff car park to the South side of the airport has a further negative effect because of the additional emissions generated CO2 and particulates from combustion, brake and tyre wear.
- 29. A survey of BALPA members showed that 65% approach the airport from the North (survey results attached, **Appendix E**). The attached map indicates that 65% of staff will need to drive an additional 1.2 miles (0.6 each way see map, **Appendix F**) to and from the Southern airport roundabout every time they go to work, 35% approaching from the South will save 1.2 miles per day, the net effect being 30% of airline staff driving extra mileage and creating additional emissions due to the staff car park move.
- 30. Having parked 1.6 miles from their place of work, all staff except for the small number working in the new admin building need to be transported to the terminal (see map, Appendix G). Bristol Airport runs a staff bus service in order to transfer staff between the car park and terminal. Three large buses run continuously from 0500 until 0200. A reduced service is run from 0200 until 0500. Similar but separate buses are used to ferry passengers between the Silver Zone and the terminal. It is not uncommon for airports to place long stay passenger car parks remotely from the terminal. This makes sense when the car is likely to remain parked for perhaps a week rather than several hours in the case of staff and this occurs only once or twice a year. For staff this transfer is a daily process.
- 31. BAL's public policy is to significantly reduce the number of journeys to work by private car, however given the airport's location and very poor public transport links (despite recent improvements) it is difficult to see how this is a realistic goal for those working shifts with an early start or late finish with no viable public transport route.

32. Travel by sustainable means is a challenge for aircrew. Airline crew will report for flying duties at a different time every day, finish work at a different time every day and work with different people every day. Furthermore duties are often changed at the last minute or flights delayed. These factors make car sharing impractical, indeed even husbands and wives who both work for the same airline will generally avoid sharing a car because of the uncertainty around finish times. There is only one public transport service - the airport flyer - which runs at high frequency from Bristol city centre to the airport that is suitable for airline staff, but very few live close enough to the very limited number of bus stops to make this a viable option. Airline staff live all over the South West and Wales, a survey of the largest airline based in Bristol showed that 36% of pilots and 48% of cabin crew live more than 1 hour away by car (Appendices A and B). Single occupancy vehicle is the only mode of transport that is practical for most airline crew, and the facility to park as close as possible to place of work is obvious.

Implications of location - Health and Safety

33. Although this is an issue dealt with primarily by Mr Williams, it is relevant to note that the HSE guide to workplace transport safety (an extract of which is in **Appendix H**) states the following at paragraph 100:

"Parking areas should be as close as possible to where people need to go when they leave their vehicles."

- 34. This guidance is particularly pertinent for airline crew for obvious reasons. It is supported by the responses to the surveys of pilots and air crew undertaken by BALPA in which:
- Over 90% considered that the airport should provide parking on the north side of the airport (Q3) (81% strongly agreed; 13% agreed)

- Over 95% considered that parking on the south side would increase their fatigue levels
 (89% strongly agreed; 17% agreed)
- Only 14% considered that the extra time spent getting to and from work would not impact their fatigue levels.

Appendices

Appendix A: Cabin Crew Survey

Appendix B: Pilot Survey

Appendix C: BALPA objection to new Silver Zone building

Appendix D: Map of southside car park, main area

Appendix E: Crew survey post staff car park move

Appendix F: Map showing Staff extra mileage to southside car park

Appendix G: Map showing bus route form southside staff parking to staff reporting point

Appendix H: HSE guide to workplace transport safety

Appendix I: Northside multi story car park occupancy statistics May to August 2018

Appendix J: Bristol Airport car park pricing analysis