

# **RULE 6 PARTY PROOF OF EVIDENCE SUMMARY**

**INTO THE REFUSAL BY**

**NORTH SOMERSET COUNCIL**

**FOR THE EXPANSION OF BRISTOL AIRPORT**

**Reference ; APP/D0121/W/20/3259234**

**SUTHERLAND PROPERTY  
& LEGAL SERVICES LTD**



**PLANNING & ARCHITECTURAL CONSULTANCY SERVICE**

## SUMMARY

1. I act for the rule 6 party who is the owner of an alternative site proposed for the provision of airport car parking, Mr Michael Pearce. There are many local landowners who use their Permitted Development Rights to lawfully provide car-parking to serve airport customers, none of these activities have been assessed by BAL to inform parking demand.

2. Part of the BAL proposal is the creation of additional ground level car parking on Green Belt land. BAL carried out a locational sequential assessment of alternative available sites and concluded there were no other sites available. This is not correct. BAL have not considered the alternative site. The BAL Planning Statement states the following as its very special circumstances for Green Belt Car Parking:

*“With specific regard to car parking in the Green Belt, these very special circumstances also include the nature of the demand for car parking and the lack of alternative suitable sites (as demonstrated through the application of the sequential approach outline above).”*

3. The BAL proposal for the additional element of car parking is accepted as inappropriate development in the Green Belt by BAL yet the proposal concludes very special circumstances exist due to the absence of any alternative provision.

4. Even though application 18/P/5118/OUT was refused Bristol Airport can still expand by an additional 1.8 million passengers a year under the existing consent. No parking has been identified to meet this need. No assessment of the current off site airport parking operations (“OACP”) has been included in the calculations provided by the airport. In the absence of an assessment of the other airport parking in the area being provided, BAL cannot with any certainty provide a realistic assessment of the parking need arising from their operation of the airport.

## SUBMISSIONS

5. It is in evidence that a significant percentage of the BAL income is achieved through their on site parking provision. Perhaps the biggest challenge for airports is the fact that significantly improved surface access could present a fundamental challenge to their business models.

6. At present, Local Plan Policy supports a monopoly for the Airport by requiring any airport parking provision off site to be acceptable only in association with hotel or overnight stay provision. It is unsustainable to continue to allow BAL to expand and

encroach into the Green Belt when other more suitable off-site provision can be delivered without impact on the services the airport provides and without further development in the Green Belt.

**7.** The aim of Policy DM30 (Off-airport car parking) is;

*“to appropriately manage the demand for travel by car by ensuring that the provision of car parks is balanced with the need to promote wider travel choices and to protect the Green Belt from off-airport car parking”.*

The supporting text acknowledges that this aim is mainly achieved through the Green Belt status itself. No policy for non green belt OACP has been considered. Numerous appeal decisions have established that airport car parking is inappropriate development in the Green Belt. Policy further states that the aim is also achieved by making alternative provision for airport-related car parking, while preventing an over-provision that would discourage the use of alternative modes of travel to and from Bristol Airport. The LPA does not support any “alternative provision for airport related car parking”.

**8.** The LPA committed to reviewing off airport car parking provision in the Local Plan process on 29 May 2020. No further work has been carried out by the LPA on the matter. The basis of the Policy was predicated on the planning balance between allowing an OACP site and ensuring that doing so does not undermine the ASAS. It is accepted the ASAS is significantly outdated and BAL have not updated it for this appeal. The LPA did carry out a basic investigation as to whether to consider off site Park and Ride facilities after the submission for an off site parking operation adjacent the M5. The LPA contacted South Gloucester Council and Bristol City Council in an attempt to identify land.

**9.** The 2012 CAA Passenger survey indicated that between 5 and 10% of passengers may be using OACP. The BAL Parking Demand Survey 2018/2019 and recent update all refer to OACP not being within their knowledge. The LPA hold historical evidence, that demonstrate the contribution to the rural economy that the OACP sector create in terms of jobs and businesses. I confirm that over 140 people are employed by the operators I am aware of with a parking spaces total of approximately 2500 spaces. Turnover exceeds £3m.

**10.** BAL have not implemented the consented multi storey car park on the Site

**11.** BAL states that the current airport car parking capacity is running at 95%. This is with passenger numbers at 8.2mppa. This demonstrates that there is insufficient parking for the already consented 10mppa, let alone the 12mppa applied for.

**12.** It is acknowledged that the changes to the Green Belt through the Replacement Local Plan (2007) and the absence of any need for large scale further revisions of the Green Belt meant that no changes to the Green Belt were proposed in the Core Strategy.

**13.** The Sequential Test approach used by BAL is set out in Chapter 5 of the 'Parking Strategy'. The overarching approach is as follows:

- Sites within the Green Belt inset;
- Strategic park and ride locations remote from the airport including land outside the Green Belt;
- Sites within the airport site but outside the Green Belt inset;
- Sites in Green Belt locations contiguous to the airport site.

*"The aim of the sequential approach outlined above is to ensure that all potential development options are appraised before moving onto the next area of search in the sequence. The approach ensures that BAL's operational land within the Green Belt inset is maximised (within operational requirements)."*

**14.** This methodology is agreed and is in compliance with Local Planning Policies, the NPPF and PPG. The hierarchy as set out accurately reflects where BAL should look to place additional airport car parking. The assessment of the shortlisted sites is included as Table 5.4 of the BAL Parking Strategy. Paragraphs 5.4.11 to 5.4.14 of the Parking Strategy summarise the findings of the short list as concluding there are no realistic OACP sites.

**15.** The reasons for BAL discounting OACP are incorrect and unevidenced

The application at Heathfield Park is available, appropriate and can be delivered swiftly once consent is granted. The parking provision will be block parking / valet parking as at the silver zone allowing for maximum density. The offer for onward transmission to the airport is comparable to that offered by BAL from its car parking areas.

## **ALTERNATIVE SITE DETAILS**

**16.** The site is located on the A370. The land is categorised as brown field land in the open countryside.

**17.** The site is located within Flood Zone 3a and 3b. Whilst the site benefits from flood defences, a FRA and flood mitigation programme has been included to ensure no adverse impact arises on flood storage from the provision of parking spaces. It has been confirmed by drainage engineers that the site contains suitable flood protection and the IDB do not object.

**18.** Access is via the A370 with highways consultants confirming that the capacity at Junction 21 and adjacent the road access junction is suitable for the intended use. Highways England do not object to the proposal.

**19.** The application was submitted 26 June 2020 but not registered by the LPA until February 2021. Mr Pearce is proposing to accommodate the necessary airport car parking at a site near to J21 of the M5 on the A370. This will remove existing pressure from the surrounding roads while safeguarding Green Belt land.

**20.** The offer will be valet parking with eco-friendly buses - a bus service operated every 20 minutes from the car park, replacing thousands of cars with between 3 and 5 buses every hour.

**21.** The site provides a comparable travel time for airport passengers coming from the southwest (which is identified as the major growth route). It will be similar in cost to the Silver Zone car parking, giving airport users a low-cost car parking option (which the airport has stated is in high demand).

**22.** The criteria of the BAL Sequential Test (Parking Strategy Appendix A) are reapplied to the alternative site at Figure 5.1 in our statement of case.

**23.** The Sequential Test for application 18/P/5118/OUT was flawed in its assessment of alternative provision. Airport car parking is available, deliverable, viable and provides a comparable service to the existing Silver Zone car parking. Parking near J21 also provides the major additional benefits of:

- Not being in the Green Belt
- Removing traffic destined for the airport from North Somerset's A roads.