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Via email: Leanne.palmer@planninginspectorate.gov.uk

08 February 2021

Dear Sir/Madam,

APP/D0121/W/20/3259234: TOWN AND COUNTRY PLANNING ACT 1990, APPEAL UNDER SECTION 78 BY BRISTOL AIRPORT LIMITED

I write in relation to the above referenced planning appeal by Bristol Airport Limited for the site known as Bristol Airport, North Side Road, Felton, Wrington and the proposals for the development of Bristol Airport to enable a throughput of 12 million terminal passengers in any 12-month calendar period.

Throughout the outline planning application process (reference 18/P/5118/OUT), Highways England worked with the applicant and North Somerset Council to determine the development traffic impact on the Strategic Road Network (SRN), particularly the M5 and junctions 18-22 inclusive, and identify any necessary infrastructure improvements to ensure the development did not result in a severe capacity or unacceptable highway safety impact.

At the planning application stage and, following the subsequent submission of further information (20/P/2896/APP/CON), Highways England was content that the applicant had undertaken a robust and appropriate assessment of the residual traffic impact of the development on the SRN. As a result, improvement works at M5 junction 22 were identified as necessary to ensure that a severe or unacceptable impact does not arise. For your convenience, the relevant formal responses by Highways England are appended to this letter.

Over the next few months, we anticipate that we will enter into a Statement of Common Ground with the appellant which will confirm that, for Highways England and Bristol Airport Limited, we are satisfied there are no outstanding matters to be resolved on the basis that both parties agree the improvement works at M5 junction 22 are necessary to make the proposed development acceptable in highways and transport terms.

Highways England is therefore not intending to apply for Rule 6 status for the forthcoming planning appeal. However, should the Inspector(s) have any further questions for us, or require clarification on any matters relating to the SRN, please do not hesitate to contact Rachel Sandy, Spatial Planning Team Leader, Rachel.Sandy@highwaysengland.co.uk.

Yours sincerely



Rachel Sandy
South West Operations Directorate
Email: Rachel.Sandy@highwaysengland.co.uk

Inclusions:

Highways England Planning Response – Conditions (18/P/5118/OUT)

Highways England Consultation Response (20/P/2896/APPCON)



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: Divisional Director, South West Operations Division, Highways England.
planningsw@highwaysengland.co.uk

To: North Somerset Council
planningsupport@n-somerset.gov.uk

cc: transportplanning@dft.gsi.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: 18/P/5118/OUT

Referring to the hybrid application referenced above, received 20 December 2018, for outline planning permission (with reserved matters details for some elements included and some elements reserved for subsequent approval) for the further development of Bristol Airport to enable a throughput of 12 million terminal passengers in any 12 month calendar period, comprising: 2no. extensions to the terminal building and canopies over the forecourt of the main terminal building; erection of new east walkway and pier with vertical circulation cores and pre-board zones; 5m high acoustic timber fence; construction of a new service yard directly north of the western walkway; erection of a multi-storey car park north west of the terminal building with five levels providing approximately 2,150 spaces and wind turbines atop; enhancement to the internal road system including gyratory road with internal surface car parking and layout changes; enhancements to airside infrastructure including construction of new eastern taxiway link and taxiway widening (and fillets) to the southern edge of Taxiway GOLF; the year-round use of the existing Silver Zone car park extension (Phase 1) with associated permanent (fixed) lighting and CCTV; extension to the Silver Zone car park to provide approximately 2,700 spaces (Phase 2); improvements to the A38; operating within a rolling annualised cap of 4,000 night flights between the hours of 23:30 and 06:00 with no seasonal restrictions; revision to the operation of Stands 38 and 39; and landscaping and associated works at Bristol Airport, Northside Road, Felton, notice is hereby given that Highways England's formal recommendation is that we:

a) ~~offer no objection;~~

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);

- ~~e) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application.¹

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gsi.gov.uk.

Signature:



Date: 4 April 2019

Name: Rachel Sandy

Position: Spatial Planning Manager

Highways England: Brunel House, 930 Aztec West, Bristol, BS32 4SR

Rachel.Sandy@highwaysengland.co.uk

¹ Where relevant, further information will be provided within Annex A.

Annex A Highways England recommended conditions

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendation regarding application reference 18/P/5118/OUT and has been prepared by the Planning Manager for North Somerset.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policy of the Secretary of State as set out in DfT Circular 02/2013 “*The Strategic Road Network and the Delivery of Sustainable Development*” and the MHCLG National Planning Policy Framework (NPPF).

Statement of Reasons

Highways England previously provided a formal planning response in respect of the above referenced planning application dated 24 January 2019. At that time, we recommended the application not be approved for a temporary period of 3 months, to enable the applicant to provide further information regarding the impact of the development proposals on the SRN.

Since that time, Highways England has been working with the applicant and their transport consultant, PBA, to resolve the outstanding matters. Further technical information has been provided by PBA in respect of mode share (TN010 Mode Share Comparison), traffic assignment (TN018 Assignment Sensitivity Test Method Statement), person and trip generation (Technical Note TN020 Trip Generation Methodology) and M5 J22 capacity assessment (Technical Note TN023 Phased Assessment of M5 J22), which also includes development phasing/passenger profile information. These documents have been considered during the preparation of this planning response.

Mode Share

The TA has assumed a robust 15% split of passengers travelling by public transport (bus based), a figure agreed when considering the earlier 10mppa application and a mode-share target secured by the associated S106 agreement and subject to the successful implementation of the surface access strategy. It is understood that recent surveys by Bristol Airport suggest that the Airport currently has a figure of approximately 12.5% modal split for public transport. In our previous response, we outlined our concern that the modal split assumptions for future passenger travel to the Airport had been ‘reverse engineered’ from a target which has not yet been achieved. It may not therefore represent a realistic future forecast and would also rely on encouraging modal shift for existing passengers. On this basis, we requested that a sensitivity test assuming a lower public transport modal split be provided by the applicant.

TN010 sets out that the CAA methodology uses ‘main mode of transport’ to derive the mode share for travel to the Airport based on one mode of transport per journey. Given

the distance from Bristol's main rail station (Bristol Temple Meads) to the Airport, anyone predominantly travelling by train to reach the Airport would need to complete their journey using a different mode (usually bus or taxi, with only bus being included as public transport in the Bristol Airport survey). Therefore, this approach creates an inconsistency between CAA survey data and Bristol Airport's 'front door' survey data, with travel by public transport accounting for 17% and 12.5% of trips respectively (the 12.5% public transport mode share result from the Bristol Airport survey not including rail-taxi journeys to/from the Airport). This means that a robust (15%) public transport mode share has been used for the assessment.

Highways England understands that for a future Surface Access Strategy and mode share monitoring regime there will need to be a detailed local survey that could be aligned to the CAA survey data. This would enable more robust mode share targets to be established and the assessment/monitoring approach to be understood by all parties.

When setting these targets, Highways England will expect that the relationship with the quantum of parking provision (including formal off-site Airport parking) will be clearly set out, along with commitments regarding how the availability of parking will be aligned to public transport provision such that the potential to achieve mode share targets is maximised.

Forecast Traffic Assignment

To assign new vehicle trips from the 2mppa increase onto the highway network, PBA developed a basic highway model using the SATURN software package. In our previous response, we noted that the assessment of journeys using an all or nothing assignment methodology for journeys between the Airport and locations in North Somerset assumed a limited number of origin/destination points. Highways England considered that this was too coarse an assumption and the level of disaggregation of the data should be increased.

TN018 shows that passenger and employee data disaggregated by MSOA areas (Figure 3.1 and Figure 3.2). Table 3.1 then aggregates these areas into 11 'zones'.

The routes assumed to be taken between the North Somerset origin/destination and the Airport are shown pictorially in Appendix A. Highways England noted that no traffic was shown/assumed to route via the A370/M5 J21 despite this being the route for local bus and coach services to the Airport, and known constraints on the A371 through Banwell. PBA subsequently updated the routing assumptions to ensure that zones 1 and 2 (Weston-super-Mare) route along the A370 via M5 J21.

On the basis that the further disaggregation of model data and more refined route assumptions in North Somerset, with journeys crossing the motorway at motorway junctions now forming an element of the main assessment (not a sensitivity test), Highways England has been able to confirm we are now satisfied with the forecast traffic assignment.

SRN Impact Assessment

In our previous planning response, Highways England requested that information showing the increase in vehicle demand at M5 junctions 18 to 22 inclusive was made

available and highlighted our particular concern with the development impact at M5 junction 22 identified in the original assessment.

On the basis of the refined traffic assignment work outlined above, Highways England is satisfied that the proposed development is unlikely to result in a severe adverse impact at M5 junctions 18 to 21 inclusive. However, we previously noted that M5 junction 22 currently experiences mainline queuing on the northbound off-slip during peak times as a result of existing demand and the interaction with the A38 Edithmead junction. Therefore, any adverse impact in this location as a result of the development proposals would be unacceptable and contrary to policy as set out in paragraphs 9 and 10 of DfT Circular 02/2013.

The original assessment demonstrated that at M5 junction 22, the forecast full development traffic increase equates to 40 two-way trips in the network morning peak (25 inbound and 15 outbound) and 61 two-way trips (36 inbound and 25 outbound) in the network evening peak. During the 'airport peak' an additional 119 two-way trips (54 inbound and 66 outbound) route through M5 junction 22. The full development impact at M5 junction 22 is unchanged following the refined forecast assignment work. In light of the existing performance and operation of the junction, as outlined above, Highways England considers this to be a severe impact.

In our previous planning response, we noted that the adopted Sedgemoor Local Plan includes as policy, the requirement for improvement works at M5 junction 22/A38 Edithmead roundabout to ensure the impact of the future planned growth on the SRN is not severe and that the economic sustainability of development across the Plan area can be supported. The proposed Airport development is 'over and above' the development set out within the Plan, but Highways England is satisfied that the identified M5 junction 22/A38 Edithmead roundabout signalisation scheme would be sufficient to safely accommodate the Plan plus the Airport development impact.

TN023 provides a further assessment of the Airport development impact at M5 junction 22 based on a phased passenger profile, recognising that the proposed 12mppa maximum passenger cap (an additional 2mppa from the current consented maximum cap) would be reached incrementally over a period of time (i.e. it would not occur immediately at opening year). TN023 sets out that there is unlikely to be a material or perceptible development impact at M5 junction 22 until the Airport reaches 10.984mppa, at which point the increase in demand at the junction would exceed 30 additional two-way movements (the level at which capacity assessment is typically required). Highways England is satisfied that whilst there are existing operational and performance constraints in this location, the development proposals would not result in a material, perceptible adverse impact (on which we could sustain an objection) until the increase in demand exceeded 30 two-way movements.

Furthermore, as a result of the current operational issues at M5 junction 22, Highways England is progressing a study to refine the required improvement scheme option identified in the Sedgemoor Local Plan (signalisation). We will subsequently seek to identify appropriate potential funding and delivery mechanisms, in collaboration with Local Authority partners and other stakeholders.

Recommendation:

On the basis of the above comments, Highways England recommends that the application be approved subject to the following planning condition being attached to any permission that may be granted:

The passenger throughput at Bristol Airport, as defined by the development hereby approved, in combination with the extant consent reference 09/P/1020/OT2, shall not exceed 11 million passengers in any 12 month period (to be taken from 1 January to 31 December unless a different 12 month start and end date is agreed) unless either:

- a. Improvement works at M5 junction 22/A38 Edithmead roundabout, comprising the full signalisation of the A38 Edithmead roundabout, have been implemented in full and are open to traffic; or
- b. An alternative scheme is proposed by the applicant and implemented in full to ensure that the predicted traffic effects at M5 junction 22 caused by the development are mitigated to at least the same extent as (a). This alternative scheme is to be agreed in writing by the Planning Authority in consultation with Highways England, Somerset County Council and Sedgemoor District Council.

Reason: to ensure the safe and efficient operation of the SRN i.e. M5 junction 22.

I trust the above is clear. Please do not hesitate to contact me should you wish to discuss further.

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Via email: planningsupport@n-somerset.gov.uk
dm scanningrequests@n-somerset.gov.uk

Direct Line: 0300 470 4112

04 January 2021

Dear Planning Team,

20/P/2896/APPCON BRISTOL AIRPORT LIMITED ADDENDUM TO ENVIRONMENTAL STATEMENT AND ASSOCIATED DOCUMENTS

Thank you for consulting Highways England in respect of the submission of an addendum to the Environmental Statement and associated documents by Bristol Airport Limited (BAL) in relation to its appeal against the decision of North Somerset Council to refuse planning application 18/P/5118/OUT for outline planning permission (with reserved matters details for some elements included and some elements reserved for subsequent approval) for the development of Bristol Airport to enable a throughput of 12 million terminal passengers in any 12 month calendar period and operating within a rolling annualised cap of 4,000 night flights between the hours of 23:30 and 06:00 with no seasonal restrictions.

We are responsible for operating, maintaining and improving the Strategic Road Network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term safe operation and integrity. In relation to Bristol Airport, our primary consideration is the continued safe operation of the M5 and its junctions 18-22 inclusive. It is on the basis of these responsibilities that Highways England provided its formal response and recommendations to planning application 18/P/5118/OUT.

Our response to this consultation should be read in conjunction with our formal response to planning application 18/P/5118/OUT dated 4 April 2019, which recommended that the application be approved subject to the following planning condition being attached to any permission that may be granted:

The passenger throughput at Bristol Airport, as defined by the development hereby approved, in combination with the extant consent reference 09/P/1020/OT2, shall not exceed 11 million passengers in any 12 month period (to be taken from 1 January to 31 December unless a different 12 month start and end date is agreed) unless either:

- a. Improvement works at M5 junction 22/A38 Edithmead roundabout, comprising the full signalisation of the A38 Edithmead roundabout, have been implemented in full and are open to traffic; or
- b. An alternative scheme is proposed by the applicant and implemented in full to ensure that the predicted traffic effects at M5 junction 22 caused by the development are mitigated to at least the same extent as (a). This alternative scheme is to be agreed in writing by the Planning Authority in consultation with Highways England, Somerset County Council and Sedgemoor District Council.

Reason: to ensure the safe and efficient operation of the SRN i.e. M5 junction 22.

Our recommended planning condition was agreed as necessary with BAL and the Council, and subsequently included as draft condition 23 within the Council's proposed planning conditions set out within the Planning and Regulatory Committee Report 10 February 2020.

Highways England has reviewed the Transport Assessment Addendum (Appendix 5A Environmental Statement Addendum Volume 1) prepared by Stantec, dated 18 November 2020 (TAA) submitted in support of the appeal reference 20/P/2896/APPCON. The TAA provides revised development traffic impacts associated with the uplift from 10mppa to 12mppa for M5 junctions 18-22 inclusive under different growth scenarios. Highways England remains satisfied that for M5 junctions 18-21 inclusive the increase in traffic demand associated with the development is not significant and is unlikely to adversely impact existing performance and/or operation.

The TAA identifies at paragraphs 4.3.11 to 4.3.13 and figure 4.4, the revised development traffic impact at M5 junction 22 for the 2030 Core Scenario. This analysis demonstrates that whilst overall combined peak period flows (morning peak hour, 'airport' peak hour, evening peak hour) are predicted to reduce, development traffic impact during the evening peak hour is forecast to increase from 61 (Transport Assessment Supplementary Document 2019) to 84 vehicles.

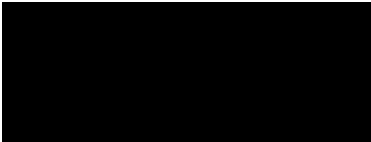
The TAA confirms that on the basis of the revised impact assessment, draft condition 23 remains appropriate. Highways England is satisfied that for the reasons set out within our formal planning response to application reference 18/P/5118/OUT dated 4 April 2019, draft condition 23 (as set out above) remains appropriate and necessary.

Within our April 2019 formal response, we noted that Highways England was in the early stages of progressing a study to refine the identified improvement scheme for M5 junction 22, and would seek to work in collaboration with the relevant local authorities and stakeholders to identify potential funding and delivery mechanisms. Since we submitted our formal response, we have been supporting North Somerset Council and Sedgemoor District Council as they develop their bid to the Major Road Network investment programme for the A38 Bristol Airport Access Improvements, which includes an improvement scheme at M5 junction 22.

In summary, Highways England raises **no objection** to the development proposals at Bristol Airport (as set out within outline application 18/P/5118/OUT), subject to the planning condition outlined above (known as draft condition 23) being applied to any consent which may be granted/allowed.

I trust the above is clear, but please do not hesitate to contact me should you have any questions or queries.

Yours sincerely,



Rachel Sandy
South West Operations Directorate
Email: Rachel.Sandy@highwaysengland.co.uk