24 MAY 2019

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Neil Underhay
Principal Planning Officer
Development & Environment
North Somerset Council
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WESTON SUPER MARE

23 May 2019

Dear Mr Underhay,

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

Thank you for informing the British Airline Pilots Association (BALPA), via our planning consultant, of the additional work undertaken by Bristol Airport's consultants. We have reviewed the additional technical work undertaken in respect of transport.

You will recall that in our letter of 25 January 2019, BALPA objected to the planning application 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 cannot be justified under planning policy.

In summary, BALPA's case, in planning policy terms, was that very special circumstances did not exist for the significant expansion of parking in the Green Belt, contrary to the requirements of national planning policy and the 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.

BALPA considered that notwithstanding efforts to encourage sustainable travel, employee parking demand has not been given proper consideration. The issues, which airline staff have in getting to the airport by means other than their car were clearly set out in the draft Workplace Travel Plan 2018 (para 4.4.17) but then were totally ignored in the assessment. The application makes no provision for any additional staff parking spaces above the level that serves the current workforce (around 1,100 spaces), which was the level available when the passenger throughput was only 8.2m in 2017 but has risen since to 8.7m. The draft Workplace Travel Plan seeks to reduce the modal share for staff travelling in single occupancy vehicles (SOVs) from the (presumed) 2017 level of 84% to 75% in 2026, as a result of the Travel Plan initiatives.

BALPA's objection referred to the significant issue of the movement of airline staff car parking to the Silver Zone area, requiring staff catching a shuttle bus back to their signing on point. We

advised that at least 60% of staff would be driving on the A38 from the north and hence travelling past the airport. Subsequent investigations suggest that this figure may be nearer 80%. We pointed out that this change in parking arrangement has added about an extra 20 minutes to each journey to and from work and will further increase to about 30 minutes when the new airline building opens later in the year. Post 2009 work patterns (i.e. changes since the current masterplan was granted outline planning permission) require airline staff to work long days to ensure maximum utilisation of aircraft operated by the airlines based at Bristol. The amended parking arrangements for aircrew give rise to 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.

We understood that you had asked your transport advisors to consider the points that we made as you appreciated the significance of them. We have reviewed the additional transport post-submission sensitivity tests to see whether these take into account any of the points raised by BALPA but are unable to see any consideration of the points raised in our letter.

BALPA has raised these concerns directly with BAL but has not received a satisfactory response. The amended parking arrangements will, on the contrary be well suited to BAL employees working in the new admin building located adjacent to the Silver Zone parking area.

The Technical Notes on Transport

The further work undertaken has been to carry out sensitivity analysis of two different scenarios from the scenario adopted in the Transport Assessment. We understand that **Test Case 1** considers the impact of the **passenger** public transport mode share from 15% to 12.5% for the increase in passengers. For employees this involves public transport mode share at 10%.

Test Case 2 on the other hand considers an increase in the passenger public transport mode share from 15% to 17.5% for the increase to 10mppa and 12mppa. For employees this involves the target of 75% by Single Occupancy Vehicle (SOV) set out in the Workplace Travel Plan.

BALPA Comments

Test Case 1

The Core Test submitted with the application had a target of employee public transport share of 10%, so the scenario for employees under Test Case 1 is no different than that considered in the outline planning application Transport Assessment. We previously pointed out that the masterplan provides no increase in staff parking despite the increase in employees by 700.

The reduction in passenger mode share by public transport would increase the demand for parking, yet no consideration of the impact of this has been given to this in the additional information provided. The assessment considers only the impact on the highway network of the additional vehicular movements to and from the airport.

Test Case 2

This increases the mode share by public transport for both passengers and employees. Even if the 75% target for SOV use as set out in table 7.1 of the Workplace Travel Plan 2018 was met, the numbers of employees travelling by car will increase due to the additional 700 employees forecast in the 12m plan. Consequently, more staff parking will need to be identified even with this scenario.

The Employee Travel Survey

BALPA does not agree that the 2017 travel survey is robust. Table 1.1 of the draft Workplace Travel Plan 2018 does not show any consistency in the survey results into employee mode share characteristics over time. This suggests that sampling could be to blame. Examining the travel questionnaire responses from different employs groups at the airport for 2017 (table 4.2 of the draft Workplace Travel Plan), it will be seen that different organisations had very different rates of response. These range from 1% of Ryanair & Mego (employment agency staff?) to over 50% for Bristol Airport staff, Thomson Airways, OCS, Menzies, ONS and Alpha LSG. As we explained in our initial submission (and noted in the draft Workplace Travel Plan para 4.4.17), there is a very limited opportunity for airline staff to travel sustainably, because of their working regime, so their propensity for mode change will be very low.

Comparison of Bristol Public Transport Mode Share with other airports

In table 4.1 of this technical note, a number of comparator airports are deemed not to have a railway station; this is misleading. Liverpool John Lennon airport is only 3 miles from Liverpool South Parkway station, while Cardiff has a railway station (albeit with infrequent trains) and Newcastle airport has a metro station with very frequent services from Newcastle and Sunderland. Even with these facilities public transport mode share at these airports only ranges from 15- 19%.

This demonstrates just how challenging the passenger public transport mode share of 15% will be to achieve at Bristol airport.

Conclusions

The additional technical work fails to address any of the concerns set out by BALPA in our letter of 25 January 2019.

BALPA continues to consider that the masterplan strategy of expanding the Silver Zone parking area into the Green Belt would be inappropriate development which could be mitigated by moving 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.

We would welcome the opportunity to discuss our objection with your team.

Yours sincerely

[redacted]

John Stembridge-King MBE

Head of Organisation

BALPA