

**SUTHERLAND PROPERTY
& LEGAL SERVICES LTD**



BRISTOL AIRPORT CAR PARKING AT HEATHFIELD PARK

Planning Design and Access Statement

APRIL 2020

SUTHERLAND PROPERTY & LEGAL SERVICES LTD

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1. Introduction

- 1.1. An international airport with flights all over the world is considered an exciting proposition and Bristol Airport have the capability of providing a major economic boost to the region. It is likely to invite significant business investment and encourage tourists from all over the world to come and discover the delights of the South West of England. Moreover, less vehicular journeys to a London based airport for travel will be undertaken.
- 1.2. Bristol Airport is surrounded by Green Belt and the refused proposal submitted under planning reference 18/P/5118/OUT to North Somerset Council sought to expand into the Green Belt to make way for more airport car parking.
- 1.3. Though the application was refused, it brought to the fore many interesting ideas with regards to the future of the airport and how it will move forward in the future.
- 1.4. One of the biggest issues arising was the impact on local people living on the A roads surrounding the airport and the number of vehicle movements generated everyday by the airport.
- 1.5. This Planning Design and Access Statement (PDAS) sets out an alternative option to car parking at the airport. Within their submission under 18/P/5118/OUT the airport made it clear that more car parking is needed (whether the application was approved or not) and it is clear there is not sufficient room at the airport to provide additional car parking.
- 1.6. A local businessman, is proposing to accommodate the additional airport car parking at a site near to J21 off the M5, this will remove existing pressure from the surrounding airport roads while safeguarding Green Belt land so the airport does not have to expand into it.
- 1.7. The offer will be valet parking with eco-friendly buses operating from the site. There will be a bus service operated every 20 minutes from the car park, replacing thousands of cars with between 3 and 5 buses every hour, varying according to time of day and changes in passenger demand.

2. Bristol Airport Growth

2.1. Bristol Airport submitted planning application C to North Somerset Council on 11 December 2018. The description of development is as follows:

“Outline planning application (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, 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”

2.2. Although refused, the application is particularly interesting as it sets out the vision and history of Bristol Airport and their expansion ideas for the future.

2.3. Within the application Bristol Airport proposed building the additional parking directly in the Green Belt with a silver zone extension to provide approximately 2,700 spaces. This was to follow the extension of the use of an existing “seasonal” car park – also in the Green Belt.

2.4. Bristol Airport Limited (BAL) was granted outline planning permission by North Somerset Council on 16th February 2011 for the expansion of Bristol Airport to handle 10 million passengers per annum (mppa).

2.5. Bristol Airport and passenger numbers have grown by over 40%, from 5.8 mppa in 2011 to 8.2 mppa in 2017.

2.6. Application 18/P/5118/OUT proposed a further 50% growth to 12 mppa, with an overall ambition to have 20 mppa.

2.7. To facilitate this growth, part of BAL proposals involved utilising 5.1 hectares of Green belt land for the construction of 2,700 new car parking spaces.

2.8. BAL states that the current airport car parking capacity is running at 95%. Therefore, it is clear that to increase passenger numbers, further airport car parking spaces will be required.

2.9. 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. It is suggested to be at or around 8000 spaces.

3. Proposal

- 3.1. The proposal is for the provision of up to 3,000 airport carparking spaces at land to the south of the A370 near J21 of the M5 Motorway, with an associated reception building.
- 3.2. The cars will be valet parked, allowing for a greater density of cars at the location.
- 3.3. The cars will be parked on a permeable gravel surface while the entrance and circulatory roads will be paved with permeable tarmac.
- 3.4. The reception buildings footprint will be 163m² in size, it will be single storey.

4. Planning Policy

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.2. This section of the report considers the planning policy context relevant to the Green Belt element of the proposed development at Bristol Airport as contained in the Development Plan and other policy documents material to the application's determination.

Local Policy

- 4.3. The statutory development plan for North Somerset currently comprises the following:

- North Somerset Core Strategy (adopted April 2012, re-adopted incorporating the changes recommended to the remitted policies on 10 January 2017)
- Sites and Policies Plan Part 1: Development Management Policies (adopted 19 July 2016)
- Sites and Policies Plan Part 2: Site Allocations Plan (adopted 10 April 2018)

- 4.4. Those policies relevant to development in the Green Belt contained within the documents listed above have been set out below.

North Somerset Core Strategy

- 4.5. The Core Strategy is the main planning document which guides development choices and decisions in North Somerset. The document was adopted in April 2012, however following a high court challenge nine policies were remitted for re-examination. The remitted policies were then adopted in September 2015 and January 2017. The document sets out the broad long-term vision, objectives and strategic planning policies for the area up to 2026.
- 4.6. The Development Plan Proposals Map defines an inset that excludes the northern side of Bristol Airport's operation area from the Green Belt. However, land to the south of the existing terminal building, including the runway and the existing Silver Zone long stay car parking area, as well as the A38, is located in the Green Belt.
- 4.7. Within the Core Strategy, one of the Council's Priority Objectives is to continue to support North Somerset's existing Green Belt in order to prevent the sprawl of Bristol and its encroachment into valued countryside and to preserve the character of existing settlements; elsewhere, valued strategic gaps between settlements and characteristic green spaces and areas will be protected and enhanced.
- 4.8. Policy CS6 specifically relates to North Somerset's Green Belt and states the following:

“Further amendments to the Green Belt at Bristol Airport will only be considered once long-term development needs have been identified and exceptional circumstances demonstrated.”

- 4.9. The supporting text to the policy builds upon this and notes at paragraph 3.94 that a key feature of Green Belts is their permanence and they are intended to be a long-term designation. 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 to either the general extent of detailed boundaries of the Green Belt mean that no changes to the Green Belt are proposed in the Core Strategy.
- 4.10. Whilst Bristol Airport is noted as being an existing strategic development constrained by the Green Belt, the document states that any further expansions to the inset would be premature in advance of exceptional circumstances being demonstrated through evidence regarding future expansion and its land use implications. The refused application did not demonstrate exceptional circumstances.

Sites and Policies Plan Part 1: Development Management Policies

- 4.11. The Sites and Policies Plan Part 1 was adopted in July 2016 and covers a range of development issues including (amongst other matters) development in the green belt and major transport schemes. It brings forward the detailed development plan policies which complement the strategic context set out in the Core Strategy.
- 4.12. Policy DM12 expressly relates to development in the Green Belt, stating that inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances.
- 4.13. As per the Core Strategy, the document confirms that no amendments to the Green Belt are proposed as part of the Sites and Policies Plan Part 1. It recognises that the Green Belt keeps land permanently open, prevents towns and villages merging together and protects the countryside.
- 4.14. Turning to Bristol Airport, it is noteworthy that 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, which precludes inappropriate development. Numerous appeal decisions have established that car parking is inappropriate development in the Green Belt, which should not be approved except in very special circumstances. It 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.
- 4.15. This is further reiterated in the supporting text to Policy DM50 (Bristol Airport) where it states that outside the inset, Green Belt policy applies and it would be for the developer to demonstrate very special circumstances that outweigh the harm to Green Belt and any other harm.

Sites and Policies Plan Part 2: Site Allocations Plan

- 4.16. The Sites and Policies Plan Part 2 identifies the detailed allocations required to deliver the North Somerset Core Strategy and it is pertinent to note that the document does not include a specific allocation in respect of Bristol Airport, or the proposed expansion site.
- 4.17. In terms of the Green Belt, it is noted that key strategic issues of housing, employment, infrastructure and any consequential changes to the Green Belt were to be determined through the Joint Spatial Plan, a development plan document being prepared jointly by the West of England authorities for the period 2016-2036 (discussed in further detail below).

Emerging Development Plan Policy

- 4.18. The four West of England Councils – Bath and North East Somerset, Bristol City, North Somerset, and South Gloucestershire were working together to produce a West of England Joint Spatial Plan (JSP) which set out a prospectus for sustainable growth to help the Region meet its housing and transport needs for the next 20 years, to 2036.
- 4.19. The JSP was submitted to the Secretary of State on the 13th April 2018. However it has subsequently been withdrawn and NSC is developing a new emerging Local Plan without the other councils. It is noteworthy that Policy 2 of the JSP stated that the general extent of the Green Belt is to be maintained except where it is required to be amended through local plans to enable the delivery of the Strategic Development Locations at Coalpit Heath, North Keynsham, Yate, Bath Road, Brislington and Whitchurch. Thus, this policy made it clear that there were no intentions to amend the Green Belt around Bristol Airport.

National Policy

- 4.20. The revised NPPF was published in February 2019 and sets out the government's planning policies for England and how these are expected to be applied. The revised NPPF replaces the previous NPPF published in March 2012 and July 2018.
- 4.21. The revised NPPF continues to set out a presumption in favour of sustainable development; it identifies three facets of sustainable development: economic, social and environmental, noting that they are interdependent and need to be pursued mutually. Paragraph 11 sets out for decision taking, the presumption in favour of sustainable development means approving development proposals that accord with the development plan, and where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF.
- 4.22. It is further stated that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.23. Section 13 of the NPPF relates to protecting the Green Belt to which the Government attaches great importance. It states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open as the essential

characteristics of Green Belts are their openness and their permanence. The NPPF identifies the following five purposes of Green Belt land:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.24. It is noted that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

4.25. At paragraph 143, the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 builds upon this, noting that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it meets one of the criteria set out at paragraph 145 (none of which relate to the type of development proposed). Paragraph 146 also notes that certain other forms of development are not inappropriate in the Green Belt, providing they preserve its openness and do not conflict with the purposes of the land but again, none of the exceptions listed are of a similar nature to that proposed at Bristol Airport.

Summary

4.26. The statutory development plan for North Somerset currently comprises the Core Strategy, Sites and Policies Plan Part 1: Development Management Policies, and the Sites and Policies Plan Part 2: Site Allocations Plan.

4.27. It is clear across all the development plan documents that development in the Green Belt will not be approved except in very special circumstances. Prevailing development plan policy seeks to protect the Green Belt from inappropriate development as it is, by definition, harmful.

4.28. This is further reiterated in the NPPF which notes that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

4.29. In terms of Bristol Airport, it is evident that no further amendments to the Green Belt will be considered until exceptional circumstances can be demonstrated. Outside the inset, Green Belt policy applies and it would be for the developer to demonstrate very

special circumstances that outweigh the harm to Green Belt and any other harm. The Council is seeking to appropriately manage the demand for travel by car to the airport, 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. Numerous appeal decisions have established that car parking is inappropriate development in the Green Belt, which should not be approved except in very special circumstances.

5. The Sequential Test and Very Special Circumstances

- 5.1. As set out in Chapter 2, the airport is at 95% carparking capacity but has permission for an additional 1.8 million passengers per annum. Within application 18/P/5118/OUT it was set out that the airport wanted to expand into the green belt to create new capacity. Though refused it was touted to be the only place the airport can extend to.
- 5.2. To build in the Green Belt an application must demonstrate very special circumstances. This element of application no. 18/P/5118/OUT is examined in this chapter.
- 5.3. The BAL Planning Statement has assessed the proposed Silver Zone extension as inappropriate development:

“When assessed against these criteria, the proposed extension to the Silver Zone car park (Phase 2) is considered by BAL to be ‘inappropriate’ development within the Green Belt whilst the operational change to Phase 1 would represent a departure from an existing permission and could be also be deemed to be ‘inappropriate’.”

- 5.4. It is agreed that the proposed Silver Zone care park extension is considered to be inappropriate in the Green Belt.

Sequential Test

- 5.5. Applications in the Green Belt must pass a Sequential Test. The Sequential Test explores all other options and sites for the same use, and if no other sites are viable or available then the site passes the Sequential Test as no other site could accommodate the use.
- 5.6. The Sequential Test approach used by BAL is set out in Chapter 5 of the ‘Parking Strategy’ under the heading ‘Review of Potential Car Parking Locations’. The overarching approach is as follows:
1. Sites within the Green Belt inset;
 2. Strategic park and ride locations remote from the airport including land outside the Green Belt;
 3. Sites within the airport site but outside the Green Belt inset;
 4. Sites in Green Belt locations contiguous to the airport site.
- 5.7. Chapter 5 sets out the following:

“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).”

- 5.8. This methodology is agreed with 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.
- 5.9. The workings of the Sequential Test mean that each tier must be assessed before a new tier is moved to. As an example, if suitable provision could be found in tier 2 it would be inappropriate to then propose a site in tier 3 or 4.

Sites Within the Green Belt Inset

- 5.10. The rationale behind construction within the Green Belt is agreed with. Further development of multi-storey car parks within the Green Belt inset would have a 'likely significant' visual impact on residential receptors along Downside Road (and potentially further reaching views into the Green Belt).
- 5.11. The economic case is also noted; multi storey car parking is economically unviable and also fails to provide for the identified need of low-cost parking. The Sequential Test identifies a justifiable concern that failure to provide low cost parking will mean more unauthorised off-site provision and more on-street car parking.

Strategic park and ride locations remote from the airport including land outside the Green Belt

- 5.12. BAL has undertaken a 'two step' process to identify potential off-site parking locations, this is as follows:
- Assessment of an initial longlist of identified sites which could potentially fulfil demand requirements using pre-defined selection criteria to identify a shortlist of potential sites; and
 - More detailed review of the strengths and weaknesses of shortlisted sites in order to identify any possible preferred options.

Long List

- 5.13. The 'long list' for potential sites was identified as follows:

"1. Key catchment areas were identified based on passenger origins obtained from the 2015 CAA terminating passenger survey (see Section 2.3). This enabled an estimate on the quantity of spaces required to serve passengers coming from the north (South Wales and the West Midlands) and from the south (Devon, Cornwall and parts of Somerset).

2. Within these broad catchment areas, available land that is easily accessible from the major strategic highways were identified, as these sites would offer the greatest convenience and have the lowest interchange penalty for passengers changing to the shuttle services.

3. Potential parking sites located next to existing airport services such as the Flyer and Falcon would mean that passengers could use existing services without the need to introduce a completely new bus service."

5.14. The above criteria are agreed with and provide a sound base for assessing available sites.

5.15. At Appendix A of the Parking Strategy, the Off-Site Assessment Criteria is set out in detail. This is included at Appendix II of this report.

5.16. Table 5.2 of the Parking Strategy sets out the Off-Site Assessment Criteria; this criteria has been turned into a traffic light system with the results shown in table 5.3 of the Parking Strategy (copied in as Figure 4.1 below).

5.17. Of the 25 sites assessed, the subject site was not identified. However, BAL identified a similar site adjacent to the A370 referred to as M5 Junction 21 (site 21) which was

Description	No of spaces	Distance from airport	PT accessibility	Accessibility to SRN	Likelihood of use	JT Reliability	Green Belt	Readiness to implement	Loss of Amenity	Summary
1 Severn Beach (M49 Avonmouth Junction improvements)	✓	!	!	✓	✓	✓	✓	✓	✓	✓
2 Avonmouth North W	✓	!	!	✓	✓	✓	✓	!	✓	✓
3 Cheddar Carboot	✓	!	✓	✗	✗	✓	✓	!	✗	!
4 Quarry at Hyatts Wood Road	✓	✓	✓	✓	✓	✓	✗	!	✓	!
5 MoD Abbey Wood Car Park	✓	✓	!	!	!	!	✗	!	✗	!
6 Avonmouth North E	✓	!	!	✓	✓	!	✓	!	✓	!
7 SW Karting	!	!	!	✗	✗	✓	✓	!	✗	!
8 Avonmouth South	✓	!	!	✓	✓	✓	✓	!	✓	✓
9 Worle Parkway Station	!	!	✓	✓	!	✓	✓	!	✓	!
10 Liberty Freight Yard	!	✓	!	✓	!	✓	✓	✗	!	!
11 Auction House (Bridgwater)	!	!	✓	✓	!	✓	✓	✓	✗	!
12 Hinckley Yard	!	!	✓	✓	!	✓	✓	!	✗	!
13 Bristol Water Bedminster Depot	✗	✓	!	✓	!	✓	✓	✓	✓	!
14 Bath Road	✗	!	!	✓	✗	✗	✓	!	✓	!
15 Severn Paper Mill (North)	!	!	!	!	!	✓	✓	!	✗	!
16 Cleeve Court	!	✓	✓	✓	!	✓	✗	!	✓	!
17 Severn Paper Mill (South)	!	!	!	!	!	✓	✓	!	✗	!
18 Davan Caravans - M5 J21	✗	!	!	✓	✓	✓	✓	!	!	!
19 Western Trade Centre - Banwell	✗	!	!	!	!	!	✓	✗	✗	!
20 Pub at West Town Road - Backwell	✗	✓	✓	✓	!	✓	✗	✓	✓	!
21 M5 Junction 21	!	!	✓	✓	✓	✓	✓	✓	!	✓
22 Ashton Vale South	!	✓	✓	!	!	✓	✗	!	!	!
23 Yew Tree Farm	!	✓	✓	✓	!	✓	✗	✓	✓	!
24 Whitchurch	!	!	✓	✗	✗	✓	✗	!	!	✗
25 Lye Cross Farm	!	✓	✓	✓	!	✓	✗	✓	✓	!

Figure 4.1

assessed as positive and therefore moved to the 'short list'.

Short List

5.18. The assessment of the shortlisted sites is included as Table 5.4 of the BAL Parking Strategy. The relevant part is replicated below as Figure 4.2.

Site	Description	Strengths	Weaknesses
M5 Junction 21	Greenfield site just off M5 J21	Developable site just off major motorway M5	Possibly a limited catchment area as it is located near Weston-super-Mare.

Figure 14.2

5.19. Paragraphs 5.4.11 to 5.4.14 of the Parking Strategy summarise the findings of the short list as follows:

“The analysis of the 12 shortlisted sites above has identified a number of constraints that affect their deliverability including (inter alia) distance from the airport (which would affect passenger experience and may undermine uptake), the rural nature of the local road transport network (which means that the operational viability of these locations is marginal), high land prices, availability and the need for remediation. Further, the anticipated nature of off-site car parks assumes that cars would be self-parked; this would require more land than an operation involving block parking such as that currently provided in the Silver Zone.

As a result of the factors described above, it is concluded that a remote, off-site option is unlikely to be achievable at 12 mppa (it should also be noted that three of the shortlisted 12 sites are within the Green Belt in any case).

As there are presently no realistic off-site park and ride sites outside of the Green Belt that can effectively serve a 12 mppa capacity airport, off-site options have not been taken forward as part of the preferred car parking solution.”

5.20. The reasons for BAL discounting airport parking off site are summarised as follows:

- Limited catchment area;
- Distance from airport;
- Rural nature of transport network;
- High land prices;
- Need for remediation; and
- Self-parking so requires more land.

Very Special Circumstances

5.21. The very special circumstances are set out in section 5.3 of the Planning Statement submitted with the BAL application (ref no. 18/P/5118/OUT), with specific consideration given from 5.3.10 onwards.

5.22. In the BAL Planning Statement, it is accepted that:

“‘Very special circumstances’ must be demonstrated to justify those components of the Proposed Development that are located in the Green Belt and deemed to be inappropriate development.”

5.23. While setting out a host of economic and social reasons for the airport expansion, 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).”

Summary

5.24. BAL accept that the proposed development is ‘inappropriate in the Green Belt’ and therefore it requires the demonstration of very special circumstances for the development to be considered acceptable.

5.25. The very special circumstances demonstrated by BAL rely on the failure to find an alternative site via their sequential test and the demand for low cost, airport car parking.

5.26. The Sequential Test sets out the 4 tiered hierarchy that BAL have examined in their search for an appropriate site for their identified airport car parking needs. It is recognised in the report that an alternative to encroachment into the Green Belt is their preferred option.

5.27. The site assessment has identified a number of options, though some were favourable it has been unable to identify a suitable location for the provision of off-site airport car parking.

6. Alternative Sequential Test for Green Belt Parking at Heathfields

- 6.1. It is confirmed that a Sequential Test is required to establish the very special circumstances required to build in the Green Belt. It is also confirmed that the hierarchy established in BAL's Parking Strategy is how the Sequential Test should be undertaken. This site assessment set out in Appendix A of the Parking Strategy is also considered an appropriate way of assessing the sites available for off-site car parking options.
- 6.2. However, the findings of the Sequential Test are questionable. The Sequential Test has offered a cursory glance at other locations but does not explore their relative merits in any detail. The Sequential Test provided in chapter 5 of the Parking Strategy has been set to fail from the outset, so that the preferred options proposed by the airport become the only 'viable' option.
- 6.3. The following sets out a rebalancing act of the Sequential Test and concludes that there is another viable site available, which sits outside of the Green Belt. With a site further up the 'hierarchy' as set out in chapter 5 of the Parking Strategy, BAL cannot therefore demonstrate the very special circumstances required to build in the Green Belt.

Site

- 6.4. The site is located off of the A370. The site itself is mostly on land consented for uses in association with the neighbouring Moorland Park Gypsy Caravan Site – under 11/P/1937/F for Change of use of land and engineering works, to include alterations to the level of the land, to provide an equestrian centre, to include menage, jumping/training areas, trap racing track, paddocks and lake. This area of the land is therefore categorised as brown field land in the open countryside. The area to the road frontage is classified as open countryside.
- 6.5. The site is located within Flood Zone 3a but the site benefits from flood defences. Car parking is also considered a 'less vulnerable use' and, as such, the proposal is acceptable at this location subject to appropriate use of permeable materials and drainage strategy. It has been confirmed by drainage engineers that the site contains suitable flood protection.
- 6.6. 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.

Proposal

- 6.7. A valet parking site with space for 3,000 vehicles with a bus service operating at least every 20 minutes to Bristol Airport.

Sequential Test Assessment

6.8. The criteria of the BAL Sequential Test (Parking Strategy Appendix A) are reapplied to the proposed site. Figure 5.1 below demonstrates the findings.

	Weight	High	Medium	Low	Assessment of J21 Site
Number of spaces	1	More than 1000 potential self parking spaces	Between 250-1000 self-parking spaces	Less than 250 potential self parking spaces	Score High – Site has space for 3,000 cars parked valet style.
Distance from airport	1	Less than 10km	Between 10-50km	Over 50km	Score Medium – site is between 10 and 50km away from the airport.
Public Transport accessibility	1	Less than 600m to high frequency public transport	Between 600m-2km to public transport	Over 2km to public transport	Score High – Airport Flyer passes by site. Intention to run own bus service.
Accessibility to Strategic Road Network	2	Directly accessible to Strategic Road Network (SRN)	Between 2km-5km to SRN	Over 5km to SRN	Score High – By J21 and M5
Likelihood of use (catchment)	3	Large catchment area with accessible driving route to airport	Large catchment area but with potential access constraints	Low potential demand and/or poor access	Score High – J21 is on the M5 with connection to a National catchment area.
Peak journey time reliability	2	High end of journey time range less than 50% greater than low end	High end of journey time range between 50-100% greater than low end	High end of journey time range more than 100% greater than low end	Score High – The site is on the potential route for passengers heading to the airport (from the South West). Journey times will not differ if they use Silver Zone Green Belt extension.
Green Belt	3	Site not located within the Bristol Green Belt	n/a	Site located within the Bristol Green Belt	Score High – Site is not in Green Belt.
Readiness to implement	2	No existing structures, brownfield site	Minor ground remediation/levelling required	Existing structures would need to be removed plus ground remediation	Score High – An application is in

				where necessary	
Loss of Amenity	2	No loss to businesses/ services/ amenities	Small scale amenities to be relocated, greenspace lost	Service/ business would need to be relocated, major greenspace lost.	Score High – On land adjacent to Gypsy Caravan Site no obvious views into the site and no public footpaths traversing. There will be no loss of amenity land.

Figure 5.1

6.9. The proposed site scores high on all elements apart from distance (which is medium).

6.10. In assessing the short list, the BAL Parking Strategy gave the following weaknesses to the site at J21:

“Possibly a limited catchment area as it is located near Weston-super-Mare”

6.11. The location is not considered a weakness as the site is close to J21 of the M5 so it can cater for travellers heading to the airport from the South West and via the National Motorway Network, is easily accessible from throughout the UK. This is a major strength as it takes the cars off the road shortly after they leave the motorway and is on a logical route into the airport (therefore avoiding deviation of journey).

6.12. The BAL Parking Strategy sets out the following generic reasons why the sites on the Sequential Test short list are not considered acceptable. These are:

- Limited catchment area;
- Distance from airport;
- Rural nature of transport network;
- High land prices;
- Need for remediation; and
- Self-parking so requires more land.

6.13. Each point is addressed below.

Limited Catchment Area

6.14. The M5 is the logical route for access by travellers to the airport. As set out in the BAL Planning Application, ongoing growth in passenger numbers is anticipated to be focussed on the South West of England and South Wales and from each of these Regions, trips to Bristol Airport will naturally use the M5 motorway. From Somerset, Devon and Cornwall, trips will use the M5, typically via Junction 22 and the A38, passing through various settlements and villages en route to the airport. By remaining on the motorway for an additional 21 miles (18 minutes), passengers can easily and conveniently access the proposed Park and Ride at Junction 21. At this point, passengers’ car journey would be complete, changing instead to a high-quality bus to complete the journey to the airport, a journey of typically around 20 minutes. This would replace an onward car journey from Junction 22 via the A38 to access the Silver Zone car park, of 36 miles and typically 47 minutes (source Google Directions). Consequently, the route via Junction 21 is quicker and certainly no less convenient.

6.15. From South Wales the natural route is via the M4 motorway, then the M49 and M5. Accessing the airport directly, typically via either Junction 18, the Avon Gorge and the A370, or Junction 19 and local roads from Gordano to reach the A370 at Long Ashton is a route of around 15 miles (28 minutes), however, this requires use of some of Bristol's often congested radial commuter routes. Furthermore, although signposted via the newly completed Bristol Southern Bypass, satellite navigation systems inevitably direct this route via the minor lanes through Barrow Gurney, adding to the existing congestion on this inappropriate route

6.16. The Planning Statement for BAL also states BAL forecasts that:

"...increasing the levels of proportional demand from regions further from Bristol, specifically those South West of the airport."

6.17. BAL has identified that a major area for growth is from the South West.

6.18. The catchment area is considered extensive.

Distance from Airport

6.19. As J21 is on a natural route from the M5 to the airport distance is not considered a debilitating factor. In this instance it is an advantage as it removes the cars before they enter the single lane A roads and/ or local rural routes of North Somerset.

6.20. As J21 is well located to the motorway, the amount of time a traveller needs to allow to get to the airport is not affected. In section six are four examples of journey times from locations in the South West, in two scenarios using J21 car parking is faster (Exeter and Bridgewater), in the third and fourth scenarios (Cardiff and Yeovil) the difference is only a few minutes.

6.21. Distance from the airport is considered immaterial as an equivalent service to the Silver Zone car parking is offered. Total journey times from the south west are comparable and there is the added advantage of removing cars as soon as they leave the motorway.

Rural nature of transport network

6.22. The Airport Flyer Service passes in front of the site. Even if the Flyer service is not used, the landowner has undertaken extensive research and has set out how they can operate their own bus network with between 3 and 5 buses on the road per hour. This is demonstrated to meet forecast demand for 3,000 spaces operating at capacity.

6.23. A full functioning transport network is available, that will help remove the cars associated with the airport expansion and potential improve the existing situation by taking cars off the road that currently travel from the South West.

Self-parking so requires more land

6.24. The site will be valet parking.

Summary

6.25. It has been demonstrated that the Sequential Test provided by BAL for application 18/P/5118/OUT was flawed in its assessment of alternative provisions. Airport car parking is deliverable, viable and provides a comparable service to the existing Silver Zone car parking.

6.26. 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.

6.27. The BAL Parking Strategy set out a hierarchy for its site search. All sites in each tier must be exhausted before the next tier can be considered acceptable. The proposed site is within tier 2 and the proposed expansion into the Green Belt is within tier 4.

6.28. Therefore, any proposal to extend the airport car parking Silver Zone fails the Sequential Test and, as a result, the very special circumstances required to build in the Green Belt. The site passes the sequential test and should be approved in preference.

7. Operation of the proposed Airport Car Parking

7.1. It is recognised that to be a viable offer, parking must:

- 1 Offer a professional service;
- 2 Give value for money;
- 3 Get people to their flight in comparable time to those using the proposed Green Belt Silver Zone extension; and
- 4 Understand how to operate the service.

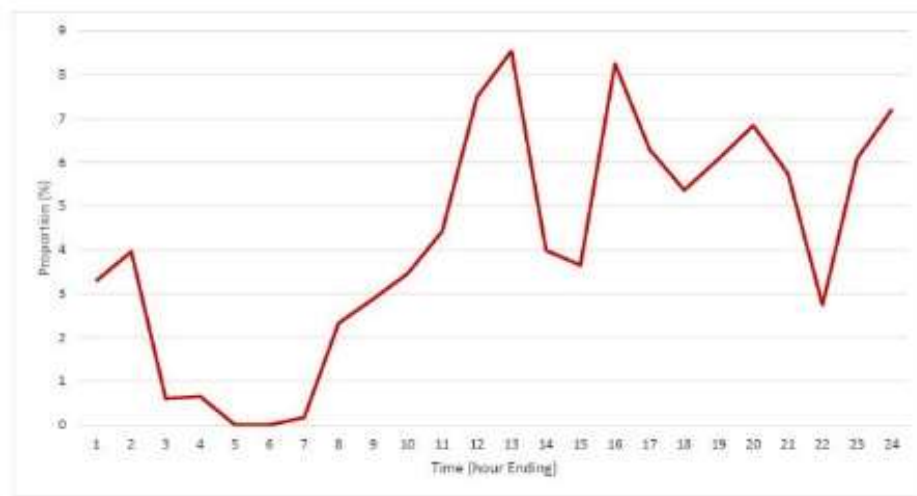
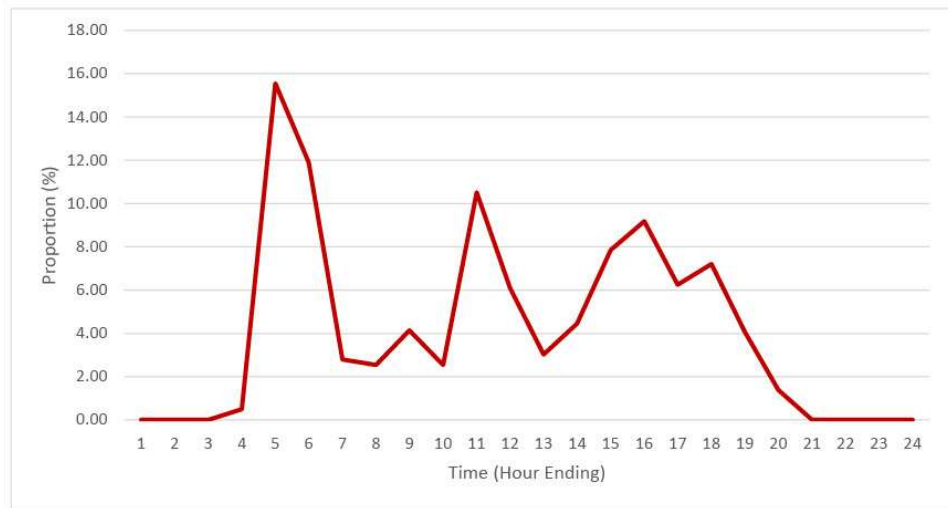
7.2. The applicant has put in extensive research over an extended time and understands how to operate a fast and effective service that meets the needs of the airport users and reduces the potential impact on the villages of the A370.

7.3. The result of this research is demonstrated below. It establishes that the proposal fully understand the requirements of the airport car parking operation and that it can, and will, provide a level of service that is required by an International Airport.

Airport Arrivals and Departures at Bristol Airport

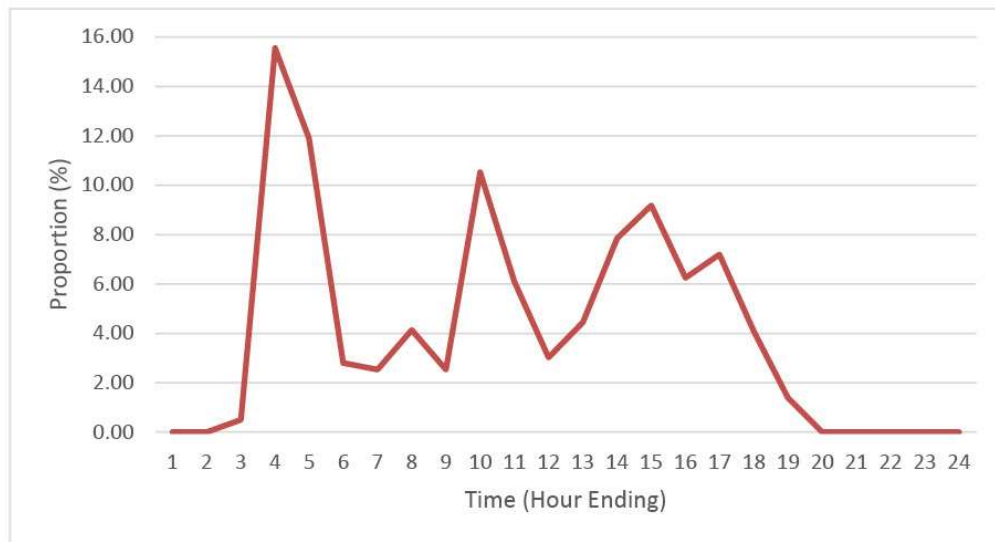
7.4. The first stage of understanding how to manage the parking operation is being aware of when passengers arrive and depart at the airport. Figures 6.1 and 6.2 respectively set out the arrival and departure profile from the airport.

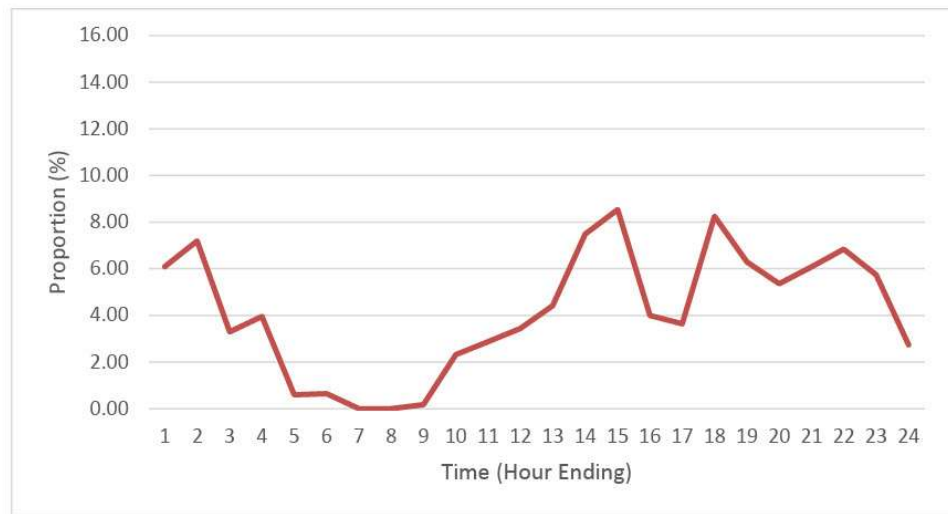
7.5. It is clear to see that there are two arrival peaks, one at 04.00 and another at 11.00.



Passenger Arrivals at Site

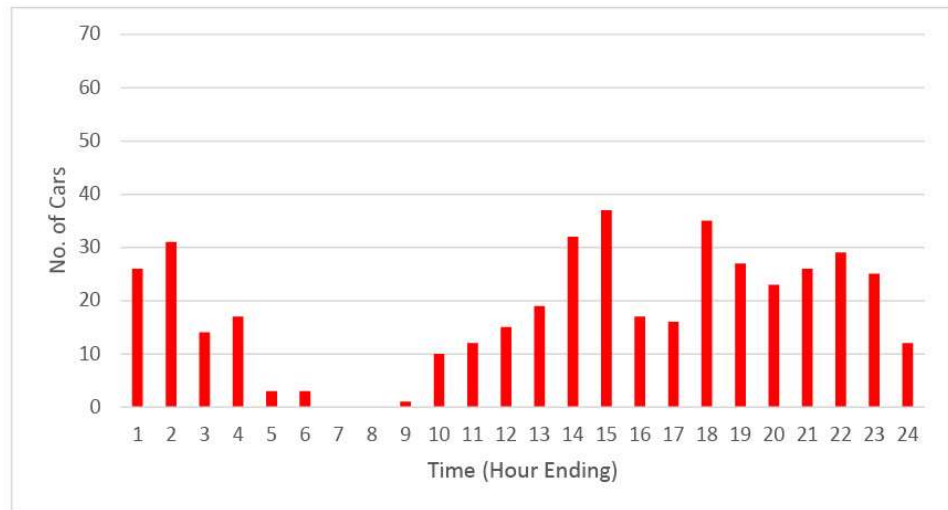
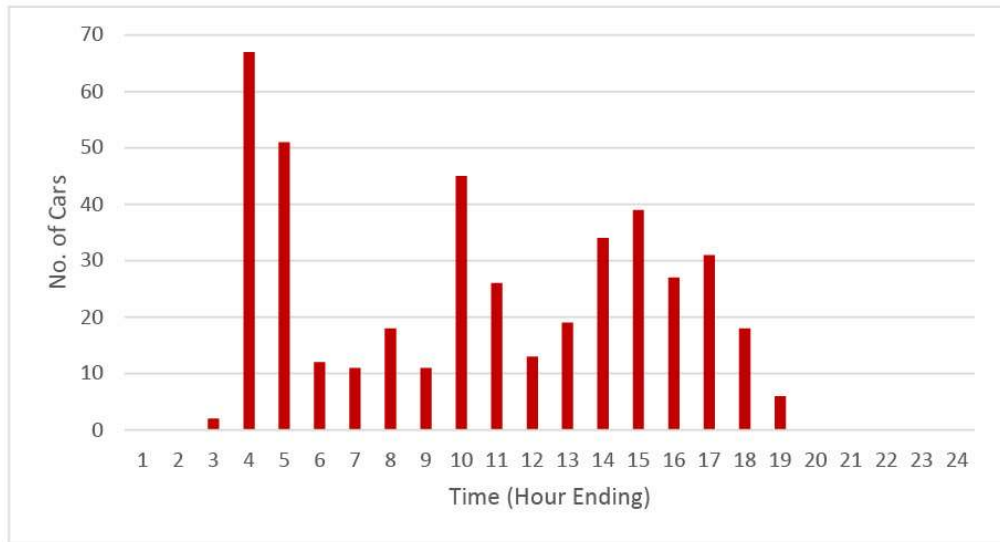
7.6. The following can be extrapolated to work out at which times these passengers will be arriving and departing from the proposed car parking site. This is set out in Figures 6.3 and 6.4 respectively.





Number of Car Arrivals

- 7.7. As the passenger movements have been established a common average formula of 1.85 people per car is used. This has been established from information obtained from the CAA , specifically for Bristol Airport and is set out in Figures 6.5 and 6.6.
- 7.8. In setting this out, the applicant knows how many spaces need to be provided in their arrivals and departure car park.



Travel Time from Site to Bristol Airport

- 7.9. Following the drop of their car a journey time of 40 minutes (including wait time, loading and unloading) is estimated from the site to the Airport front gate.
- 7.10. The proposed Bus Route is set out at Appendix III.
- 7.11. Due to the location there are alternative routes that can be used if there is an unforeseen incident on the main route. Appendix III sets out the alternative route, which has a drive time of approximately 26 minutes (when compared against the standard route of 19 minutes). This therefore extends the total journey time between the site and the airport by some 7 minutes only, in the event of extreme circumstances preventing the use of the A370.

Bus Travel

- 7.12. The route the buses will travel on is set out in Appendix III. There is room for deviation if unanticipated traffic interventions (e.g. an accident or significant works) appear on the route and an emergency diversion route has been identified. This route will only be used in occasion of a catastrophic incident, accident, works or other closure of the A370 or Downside Road.
- 7.13. A constant service is required so that passengers know exactly how long they will be waiting for a bus. Consequently, buses will depart when scheduled, regardless of whether or not they are full in order to provide a guaranteed service schedule.
- 7.14. It is the intention to run a bus every 20 minutes with an increase to every 15 minutes during the morning peaks.
- 7.15. Based on the data from Figures 6.3 and 6.4 it is anticipated that the buses will be 25 seaters.
- 7.16. A fleet of 10 no. 25 seater buses will be required to provide continuous operation. This includes an operational spare bus in order to cater for unusual peaks in demand and to permit buses to be taken out of service for short periods for servicing and other routine maintenance requirements.
- 7.17. Car parking is pre-booked with the passenger's flight number being declared such that the operators are fully aware in advance of any fluctuations or variations in demand and these can be appropriately addressed. An operational spare bus is provided in order to ensure that any works or other issues do not harm the reliability of timely service such that passengers wait for no longer than 20 minutes maximum.
- 7.18. Figures 6.7 and 6.8 set out when buses will be arriving and departing the car parking site.



Type of Buses

- 7.19. The applicant anticipates running a fleet of 10 no. 25 seater buses. This is a surplus and allows for spare capacity if an unusually large number of passengers book in for one time and for servicing and maintenance of the fleet. Due to the booking system, this will always be known in advance and can be successfully and seamlessly catered for and confirms that the roads are clearly suitable for use by buses.
- 7.20. The route proposed (Appendix III) is already used by the 'Flyer Service'. This operation uses a 55-seater bus.
- 7.21. Having viewed residents' concerns with regards to increased pollution in the surrounding villages it is the intention of the applicant to use electric buses
- 7.22. The use of electric buses has the additional benefit of emitting very low noise levels. A particular advantage when compared against regular vehicular noise which could be generated through the villages at the peak arrival time to the airport of 04:00 – 06:00 (Figure 6.1).

Value for Money

- 7.23. The applicant recognise that people using the airport car parking want value for money, this is stated by BAL in their submission documents.
- 7.24. The applicant already owns the land so there will be no purchase price.
- 7.25. It is the intention of the applicant to offer parking prices that are in correlation with those already offered at the Silver Zone car parking.

Service Level

- 7.26. It is recognised that BAL already offers a good service to its customers via its airport car parking. The applicant understands that this level of professionalism must be maintained.
- 7.27. BAL identify that expansion will generate trips exclusively from the South West and Wales. For travellers from the South West, airport parking at the site offers a similar time of arrival to the airport terminal as those currently travelling to the existing silver zone car parking.
- 7.28. Tables 6.1, 6.2 6.3 and 6.4 set out hypothetical journeys from within the Bristol Airport catchment area.
- 7.29. The journey times were assessed via Google maps, with a time of 15.00 on a Sunday set, to ensure consistency in the comparison.

7.30. When directed to go to the Silver Zone car park google maps had a preference to send the traveller via the A38. It is reasonable to assume that this characteristic will be reflected also in many satellite navigation systems.

7.31. When using car parking near J21 the traveller was taken off the M5 at Junction 21. The bus route (Appendix III), and subsequent bus circulation, is as set out in Appendix IV.

Journey from Bridgwater

Table 6.1

	J21 Car Parking	Silver Zone Car Parking
Journey Start Bridgwater	25 mins	42 mins
Time at Car Park	20 mins	20 mins
Car Park Travel time to Airport	19 mins	7 mins
Total Travel Time	1 hr 4 mins	1 hr 9 mins

Journey from Exeter

Table 6.2

	J21 Car Parking	Silver Zone Car Parking
Journey Start Exeter	1 hr 4	1 hr 20 mins
Time at Car Park	20 mins	20 mins
Car Park Travel time to Airport	19 mins	7 mins
Total Travel Time	1hr 43mins	1 hr 47 mins

Journey from Cardiff

Table 6.3

	J21 Car Parking	Silver Zone Car Parking
Journey Start Cardiff	50 mins	1 hr
Time at Car Park	20 mins	20 mins
Car Park Travel time to Airport	19 mins	7 mins
Total Travel Time	1hr 29mins	1 hr 27 mins

Journey from Yeovil

Table 6.4

	J21 Car Parking	Silver Zone Car Parking
Journey Start Yeovil	1 hr	1 hr 6 mins
Time at Car Park	20 mins	20 mins
Car Park Travel time to Airport	19 mins	7 mins
Total Travel Time	1hr 39 mins	1 hr 33 mins

- 7.32. It is the intention of the applicant to offer a 'valet parking service' of around 300 spaces available at the entrance of the site, next to a reception centre. This allows for fast car parking and key drop off on arrival and a quick exit when departing the site.
- 7.33. Cars will be moved to the rear of the site for storage while the passenger is away. Their car will then be moved to the departure car park in advance of their arrival back into Bristol Airport.

8. Other Planning Considerations

- 8.1. Further Planning Consideration are considered below.

Ecology

- 8.2. A Preliminary Ecological Appraisal Report has been submitted as part of the application.
- 8.3. The report has identified potential and anticipated impacts that may arise from the development (see section 5 of the Ecology report) and has provided mitigation (see sections 6.1 and 6.2 of the Ecology report) for each of these impacts.

- 8.4. It is concluded that impacts on protected and notable species can be mitigated successfully, with opportunities to enhance the biodiversity value of the site through planting and management of buffer areas.

Highways Impact

- 8.5. A full Transport Assessment has been prepared and submitted to support this application.
- 8.6. Substantial data collection has been undertaken, this has confirmed no material operational impact of the proposals on the A370, or Junction 21 with the M5 Motorway
- 8.7. The removal of Airport generated traffic from existing rural roads in the vicinity of the Airport, including A370 and A38 has the potential to offer significant relief to residents of the many rural settlements across the area. This would go far towards addressing many of the public objections to the BAL Application, the majority of which refer to traffic generation and resultant noise, congestion and emissions as the primary concern associated with the proposed Airport expansion.
- 8.8. The Transport Assessment concludes that the expansion of Bristol Airport can only be considered Policy compliant if the proposed Green Belt incursion by the Silver Zone extension is removed and a suitable off-site park and ride facility is found.

Health Impact Assessment

- 8.9. A Health Impact Assessment (HIA), must assess health and wellbeing impacts on communities in and next to a development.
- 8.10. Due to the location of the proposed airport parking it is considered it will have a positive benefit on local community health and well being.
- 8.11. The proposal removes traffic destined for the airport from local roads, including A370 and A38, and replaces them with a limited number of bus movements, this has the benefit of:
- Removing vehicle pollution;
 - Reduce the number of vehicles on the road, which in turn should improve highway safety;

- Limit the number of early morning vehicular movements to the airport, which will lower road noise. This will assist with resident's sleep and mental health; and
- Help to lower congestion on the rural A roads by taking cars off the road. Congestion can be a source of stress to existing residents.

8.12. The location near M5 at J21 means that vehicles will be removed from the road network before they encounter the settlements along the A370 and A38. Providing a direct benefit to these communities.

Sustainable Drainage

8.13. A Flood Risk Assessment and Sustainable Drainage Strategy have been provided as part of this application. The use of gravel surface and permeable tarmac mean that the introduction of the 163m² reception building is the only non permeable surface on site.

8.14. It is concluded that though the site is in a flood risk area it is not a vulnerable use, the site benefits from flood defences and the inclusion of a small reception building will not create an impact to flood risk elsewhere.

9. Summary and Conclusion

- 9.1. The applicant can provide a viable airport car parking provision for up to 3,000 cars close to J21 of the M5 to meet an identified need and shortfall in assessed parking provision.
- 9.2. The Silver Zone extension that was proposed by BAL failed its own Sequential Test. It also fails the test of very special circumstances, so any further attempt to build in this location would fail planning policy.
- 9.3. The proposed site is available now and work can begin as soon as an application is approved.
- 9.4. Bristol Airport can expand by 1.8 millions passengers but its car parks run at 95% capacity, room must be found for more parking.
- 9.5. The site provides a comparable travel time for airport passengers coming from the south west (which is identified as the major growth route). It will also 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).
- 9.6. Airport car parking near to J21 will remove vehicles soon after they exit the M5, keeping them off the single lane A roads and rural routes of North Somerset.
- 9.7. The thousands of cars removed from the road will be replaced by between 3 and 5 'green' busses per hour, improving traffic and congestion and air quality.