

# **SUTHERLAND PROPERTY & LEGAL SERVICES LTD**



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I act for Mr Pearce one of the rule six parties in this inquiry. I am here to raise significant concern about the way in which BAL carried out the sequential assessment of available alternative sites in relation to the parking proposals included in the proposed scheme. My client has provided off airport parking provision for in excess of 20 years and has made an application for an airport park and ride provision on the A370 near Hewish.

It is my position, and having worked with a range of offsite airport car parkers for an extended period of time, I have significant evidence to back my view, that there is a significant shortfall in airport parking provision which is being met by off airport car parking. This has not been fully analysed or considered by either the council or the airport in assessing this appeal application. Key to the lack of assessment is a failure to provide any form of evidence in relation to the existing OACPs and the rural employment and economic benefit that they bring to the local community.

Whether this appeal succeeds or not the airport has an ongoing parking need that is not currently being met by their site and which, on their own admission, is going to increase significantly and will, increase further should this appeal be allowed. The suggestion that the only way in which airport parking can be delivered is on the airport site is contradictory to the experience of all other international airports in the UK where park and ride facilities are commonly provided to ensure sustainable transport strategies are supported and customers obtain a wide range of parking options. We all know that a large proportion of the airport's income is derived from parking and that it is in their interests to have continued control over all parking for the airport. However, there is no reason why OACP cannot be successful and sustainable creating a provision that supports the financial benefits to the local rural economy and the prevention of a huge number of vehicular movements travelling onwards through the local villages on small and unsuitable roads to park on the Green Belt. Accordingly, I am challenging the operation of DM30, the airports sequential assessment and the assessed need for parking arising from the existing and proposed operation of the airport.

The alternative parking application has been proposed to meet the existing needs of the airport for more car parking to meet the approved growth in airport passengers. The site proposes a parking provision similar to that provided in the airports silver zone where customers drive to site, are provided with valet parking and electric shuttle buses will then take them onwards to the airport. The airport is as everybody knows in the Green Belt and whilst it is accepted that consent is already in place for the airport to expand beyond its existing operating capacity, this application to expand provision further means that a comprehensive review of airport parking provision is necessary.

The council have accepted that at present they cannot see how any OACP can be approved given the requirements of the airport ASAS and the need for any OACP to address and enhance sustainable travel modes. Despite knowing that there is a significant need for additional parking to serve the airport due to the airports failure to implement the sustainable travel plans originally approved, the council has determined that the only way in which OACP can be delivered is by way of DM-30 which requires any parking to be associated with overnight accommodation. Coupled with the council's policy that any overnight parking provided can only be lawful if the occupier is still present, this creates a monopoly for the

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airport preventing any other competitive OACP. Finally, it is clear that when the airport carried out the sequential assessment of available alternative sites, they failed to undertake a proper assessment of the site I am promoting despite being aware of it and the fact that an application was submitted. My proof of evidence sets out the details of the failings of the airport to assess the fact that the site I'm proposing is on brownfield land in the open countryside adjacent to an A road and close to the junction 21 of the M5 as opposed to being in the Green Belt.

Yours faithfully



Amanda Sutherland LLb. (Hons) PG Diploma LPC

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