

Town and Country Planning Act 1990
Appeal by Bristol Airport Limited
Bristol Airport, North Side Road, Felton, Bristol
Appeal Reference: APP/D0121/W/20/3259234

Statement of Case by: British Airline Pilots Association (BALPA)

1 Introduction

BALPA

1.1 The British Airline Pilots Association (BALPA) is the professional association and registered trade union established to represent the interests of all UK pilots. BALPA represents over 85% of all commercial pilots flying in the UK and pilots of all the airlines based at Bristol airport. According to table 4.1 of the Draft Workforce Travel Plan 2018, staff working for airlines based at Bristol airport accounted for 919 of the 2,976 employed full time workforce at the airport (31% of the total employees).

1.2 The Association has particular expertise in Flight Safety and Security, Fatigue and Scheduling and Occupational Health and Safety.

1.3 It is anticipated that the UNITE union, which represents cabin crew and other employees at the airport may wish to support the case being made by BALPA.

1.4 BALPA first became aware of issues in relation to the expansion of Bristol airport in 2017, when BALPA was advised that the staff parking arrangements were being significantly altered. It was subsequently ascertained that this was in accordance with the approval of outline planning permission 09/P/1020/OT2, in February 2011, for the expansion of Bristol airport to enable it to handle 10 million passengers per annum, which set out a masterplan for the development of the airport. BALPA will describe these changes and explain the implications for staff and passengers and why they overlap with key planning issues.

1.5 Although representing a key stakeholder, and despite these concerns, BALPA was not invited to pre-application consultations in relation to the further expansion of the airport and had to wait until outline planning application 18/P/5118/OUT was submitted at the end of 2018 to understand the implications of the proposals for the workforce.

Reasons for Refusal of application 18/P/5118/OUT

1.6 BALPA's case concerns the arrangements for staff parking under the proposals, and relates primarily to reason for refusal 4. However, if its objections concerning staff parking arrangements could be overcome, BALPA is not in principle opposed to further expansion of Bristol Airport.

Reason for Refusal 4:

The proposed extension to the Silver Zone car park and the year round use of the seasonal car park constitute inappropriate development in the Green Belt which is by definition harmful to the Green Belt. There are no very special circumstances which outweigh the harm to the Green belt caused by reason of inappropriateness and any other harm including the encroachment of development on the countryside and loss of openness contrary to the National Planning Policy Framework and policy DM12 of the Development Management Sites and Policies Plan Part 1 2016.

2 BALPA's Position

2.1 Inappropriate Development in the Green Belt

2.1.1 BALPA will contend that the master plan, upon which the outline planning application is based, has failed to consider appropriately the implications of the location and amount of future staff car parking that is proposed, which in turn will result in the need for more parking in the Green Belt than can be justified under planning policy.

2.1.2 The details of the masterplan, which formed part of the 2011 outline planning permission, proposed the relocation of the staff parking from near the old terminal building (on the north side of the airport) to the Silver Zone, on the south side of the airport, which is wholly within the Green Belt and is separated from the terminal buildings by the runway. That detail was not a matter of which staff were made aware at the time. It only subsequently became clear that this was the case when BAL proposed to close the north side staff car park in 2018, despite having sought and gained approval to extend that car park as recently as December 2016 (application 16/P/1440/F). The car park was closed from 1 October 2018.

2.1.3 Part of the passenger parking area in the Silver Zone was given over to staff, resulting in the loss of low cost passenger parking. Shortly after this move, the Bristol Airport admin building was opened adjacent to the new staff parking area. For the staff working in the operational area, which includes the majority of airside staff, such as pilots, cabin crew, terminal operatives and retail workers and who have to drive to work, they now have to find a parking space in the Silver Zone staff car park and catch a shuttle bus back to their workplace on the northside. This shuttle service is separate from the passenger shuttle bus. The original intention of the staff shuttle bus was that it should operate at about half hourly intervals, but with the intervention of Easyjet this frequency was increased to 10 minutes

throughout the day and night. The particular implications of this arrangement for pilots and cabin-crew will be set out below.

2.1.4 The initial Parking Demand Study submitted with the appeal application calculated that an additional 3,900 passenger car parking spaces were required for growth of Bristol airport to 12 million passengers. This figure was dependent on the basis of a modest increase in bus use by passengers from 12.5% to 15%.

2.1.5 To make up the shortfall, 2,700 additional spaces are to be found through an extension to the Silver Zone car park into the Green Belt. The remaining spaces are to be provided through a third multi storey car park (MSCP) close to the terminal, comprising 2,150 spaces (a net gain of 1200 spaces). It is also proposed to change the seasonal (May – October) use of the ‘Cogloop’ 3,650 space car park (also in the Green Belt) to all year round use.

2.1.6 Following negotiations with North Somerset Council’s officers during the consideration of the application, BAL agreed to increase the target for public transport use by passengers to 17.5%, but this has not led to a reduction in the area of car parking to be provided in the Green Belt (the Silver Zone and the full-time use of the Cogloop carpark).

2.1.7 The Parking Demand Study and the Parking Strategy which emerges from it, highlight that the demand for additional car parking comes from those seeking “low cost” rather than premium cost parking. It is understood that there is also a relationship between the availability of on-airport low cost passenger parking and the availability of unlawful off site car parks. The need to provide additional “low cost” surface parking – as opposed to premium parking in the MSCPs - forms a key element of the Appellant’s case that there are very special circumstances which justified the (acknowledged) inappropriate development in the Green Belt.

2.1.8 However, the Appellant has not sought to justify the staff car parking in the Silver Zone, which at 1,000 spaces, takes up a significant proportion of the parking in the Green Belt. Nor has it sought to consider the alternative of transferring some or all of the staff parking to the north side of the airport (inset from the Green Belt) either in the existing surface parking or the MSCP. If it were to do so this would reduce the amount of surface car parking which would be required in the Green Belt. This omission undermines the Appellant’s very special circumstances case.

2.1.9 Moreover, it will be explained that, unlike the passenger parking in the Silver Zone which is block parked, staff parking needs to be in conventional parking rows with aisles in between so that cars can enter and leave without difficulty. So whilst there may now be 1,000 parking spaces for staff in the Silver Zone, it will be demonstrated that the spaces they occupy could be more intensely parked providing 40% more low cost block parking for passengers than can be provided for staff. In short, moving the staff car parking to the north side could free-up circa. 1,400 spaces without the need for any further car parking in the Green Belt, and no additional harm to its openness (whilst it is recognised that there may be a rationale for staff who work in the admin building parking in the Silver Zone, the same does not hold true for those, such as the pilots, who are working the operational area.

2.1 10 For much of the year there is spare capacity in the north side car parking. BALPA will provide evidence of the extent of use of the new MSCP in June and July 2018 and demonstrate that, even at this peak time, there were on average at midday during June and July 460 and 540 free spaces respectively. Evidence will also be presented to show that during peak periods in summer 2019, discounted prices were used to encourage use of the MSCP. This confirms the demand for low cost rather than premium parking at the airport. Given the lack of demand for 'premium' rate parking from an airport that has predominantly leisure rather than business passengers, it seems unlikely that the additional multi storey car park can be filled without discounting the price.

2.1.11 Evidence will also be provided to show that with the ability to block park more low cost passenger cars in a given area in the Silver Zone than employee cars, the potential revenue per square metre in the Silver Zone is in some cases higher than in the long stay and MSCP areas northside. Accordingly, there would be little detriment to parking revenue by moving staff car parking northside. BALPA will argue that on Green Belt grounds, the vast majority of staff parking should be located northside to enable greater provision of low cost passenger parking in the Silver Zone.

2.1.12 BALPA will also refer to the sustainability issues of providing staff parking on the south side of the airport. It will be demonstrated that at least 60% of airport employees will be travelling from the north and hence those travelling by car will be doing excess mileage by driving past the airport. Calculations of the unnecessary mileage operated by the use of frequent shuttle buses necessary to take staff to and from the airport every working day will be provided. BAL will demonstrate that the case for 'very special circumstances' to justify the release of so much Green Belt land for passenger car parking cannot be made out, contrary to policies CS6 and DM12.

2.2 Flight Duties

2.2.1 BALPA will also argue that for aircrew in particular, there is a further crucial health and safety reason for the need for staff to park closer to their signing on point. It will be explained that this position is supported by North Somerset Core Strategy policy CS11 and also by the comments of North Somerset Council to the applicant.

2.2.2 The current working arrangements for aircrew for airlines based at Bristol will be fully explained. Briefly aircrew operate over an 18 hour day commencing with early shift departures from 0600 and sometimes earlier. Crew start work one hour before departure. Many planes will not stop operating until midnight or later, especially if there have been unexpected delays. Since 2009 pilots shift patterns have increased pilots daily working hours by at least 10%. Airline crew work lengthy and tiring days requiring commensurate recovery time between shifts. It will be explained that the increased commuting time necessitated by parking off site and being bussed back to the terminal has eaten into this recovery time.

2.2.3 Reference will be made to the European Aviation Safety Agency (EASA) Flight Time Limitations (FTL) Scheme, which requires aircrew to have a minimum 12 hour rest before their next Flight Duty period. This is supposed to allow for 8 hours sleep. It will be explained that the shift patterns adopted by the airlines provide some leeway to enable 8 hours sleep

to be achieved, but that surveys show that for 33% of pilots any flexibility has been removed by the additional commuting time since the relocation of staff parking. It will be explained that lateness in arriving for an early morning shift has led to delays to aircraft departure schedules. Reference will also be made to pilot fatigue.

2.2.4 As such, BALPA will contend that the provision of car parking in the Silver Zone – with the attendant delays caused by necessary bus transfer to and from the operational areas – means that the parking is not “adequate...to meet the needs of anticipated users (residents, workers, and visitors)”. It is therefore contrary to Core Strategy Policy CS11.

2.3 Parking Provision for Staff and Sustainable Travel Targets

2.3.1 The application was accompanied by an extensive assessment of future passenger parking demand. However, employee parking demand has not been given the same level of consideration. The issues which staff have in getting to the airport by means other than their car have been highlighted and then ignored in the analysis by the appellant.

2.3.2 The Transport Assessment and the Draft Workplace Travel Plan set out the travel opportunities for staff. BALPA will consider the progress of the airport Workplace Travel Plan since 2004 up to the Draft Workplace Travel Plan 2018, submitted with the planning application. BALPA will refer to the difficulties of reducing single use car trips to an airport located in the countryside without direct access by rail or rapid transport.

2.3.3 BALPA’s evidence will refer to paragraph 4.4.17, of the Draft Workforce Travel Plan, which sets out the difficulties that staff have in travelling to work by means other than the car and the difficulties of car sharing:

‘The 2017 questionnaire results suggests that 60% of employees work variable shift patterns.....most airlines operating at Bristol operate their flights over an 18 hour day commencing with departures from 0600 onwards. Airline employees will work shift patterns set out in their crew roster, with start and finish times varying from day to day. As an additional complexity, they are unlikely to work with the same people from one day to the next. The hours worked by security employees, terminal building concessionaires, handling agents and flight catering will also be related to the flight schedule and hours can vary from day to day. Early shifts will commence between 0300 and 0500 and late shifts will finish around midnight’.

2.3.4 BALPA will explain why, unlike the modest increase in the target for passenger bus use, the target for reducing staff single occupancy vehicle mode share by employees at the airport is likely to be more challenging. BALPA will refer to the existing shortage of staff car parking at peak times in the Silver Zone. It will consider the increase in the workforce expected from 2018 (8.6 million passengers) relative to the workforce with the airport expanded to accommodate 12m passengers and the lack of additional staff car parking, despite the substantial growth in employment. BALPA will demonstrate that even if the travel mode targets for staff are met, an increased need for staff car parking is likely to occur, for which no allowance is currently made. If ultimately there is a need to expand the staff car parking area, and this takes out further areas of block parked Silver Zone passenger

parking, this will further reduce the availability of low cost parking for passengers, leading to further pressure for the expansion of parking in the Green Belt.

2.3.5 It will be noted that North Somerset Council's Transport and Highway Comments to the applicant dated 12 November 2019 asked that '*consideration be given to locating some staff parking relative to their working locations with a view to reducing staff trips on the A38 outside the main entrance*'. As far as BALPA is aware no positive response to the request was received. The matter was raised in the report to North Somerset Council's Planning and Regulatory Committee.

3 Conclusions

3.1 For these reasons BALPA concludes that the parking strategy has failed to justify that there are very special circumstances for the scale of expansion of car parking into the Green Belt that is proposed by the outline planning application. Furthermore, the location of staff car parking is, in relation to aircrew, inadequate and fails to meet their specific needs, contrary to Policy CS11.

3.2 BALPA considers that, to overcome these issues, any planning permission granted should require an amended car parking strategy.

3.3 BALPA considers that the parking strategy and in particular BALPA's case could be efficiently handled as a round table discussion as part of the Inquiry.

3. List of Documents to be referred to include:

National Planning Policy Framework

North Somerset Core Strategy 2017

North Somerset Sites & Policies Plan Part1

Plans & Documents Submitted with Outline Planning Application 18/P/5118/OUT, including:

Draft Workforce Travel Plan 2018 Peter Brett

Parking Demand Study Teneo Consulting 2018

Parking Demand Study Addendum Teneo Consulting 2019

Parking Demand Study Nov 2020 Update Teneo Consulting

Parking Strategy Wood Environmental 2018

Transport Assessment Peter Brett 2018

Transport Assessment Addendum Stantec 2020

Bristol Airport Car Park Survey Summer 2018 BALPA

Bristol Airport Car Park Pricing Survey 2019 BALPA

Flight Time Limitations Scheme European Aviation Safety Agency

