



# **Bristol Airport Expansion to 12 million passengers per annum Planning Appeal**

**Summary Proof of Scott Witchalls**

On behalf of **Bristol Airport Limited**



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## Document Control Sheet

**Project Name:** Development of Bristol Airport to accommodate 12mppa

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**Description:** Summary Proof of Evidence of Scott Witchalls for Appeal Against North Somerset Council's Refusal of Planning Application (LPA ref. no. 18/P/5118/OUT) by Bristol Airport Limited for the Expansion of Bristol Airport to accommodate 12 Million Passengers Per Annum

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# 1 Surface Access and Proposed Improvements

- 1.1.1 Bristol Airport is well served by a network of public transport (PT) services and motorway and A road connections. Pre-Covid-19, there were some 8 separate frequent bus and coach services connecting directly to the airport covering the local and regional catchments, as well as additional less frequent local services. Temporarily suspended services as a result of the pandemic are expected to resume as travel restrictions are lifted over the second half of 2021.
- 1.1.2 The main highways access to the airport is provided via the A38 corridor connecting to one of two roundabout accesses on the A38. The northern roundabout provides access to the main terminal building, public transport interchange, drop-off area, short stay and premium long stay car parking; the southern roundabout provides access to long stay car parking (Silver Zone), staff parking and the recently completed administration building. Summer passenger parking provision totalled 17,700 spaces in 2019. A separate access on Downside Road is restricted for use by operational, logistics and emergency vehicles.
- 1.1.3 Historically, Bristol Airport was much more car dependent than it is today. Due to the significant investment by Bristol Airport Limited (BAL) working alongside the transport authorities and public transport operators over the past 16 years or so the passenger public transport mode share to Bristol Airport has increased from 8% in 2003 to 22.3% in 2019 (CAA data, last mode). Since 2012, the PT mode share has increased from 18.1% to 22.3%, showing a levelling off in growth which is a reflection of the challenge of achieving additional marginal increases in PT mode share. A stretch target of a further 2.5% increase has been set by the airport to support the application to increase capacity to 12mppa.
- 1.1.4 Comparing Bristol Airport with other regional airports (2019 CAA data) demonstrates that BAL is achieving a higher proportion of passenger trips by public transport as main mode than is typical at 21.8%, comparable with that for Manchester (20.7%) and Birmingham (20.7%) which both have railway stations, and much than other airports without a station (eg Cardiff 11.3%, Belfast Int 14.5%, East Midlands 8.4% Liverpool 19.1%(2017), Newcastle 14.5%(2017)).
- 1.1.5 As part of the application to increase passenger throughput to 12mppa, BAL is proposing to develop a new Airport Surface Access Strategy. The ASAS is the framework that sets out the measures BAL intends to implement working with the Air Transport Forum (ATF) and other delivery partners, in order to achieve more sustainable surface access targets and objectives for the airport, the key objective of which is to achieve a 2.5% further shift to PT use as part of the 12mppa application.
- 1.1.6 These include a range of measures such as bus service improvements, public transport improvement fund, publicity, interchange improvements, integration of services, parking management and pricing controls.

- 1.1.7 To address residual highways impacts, it is proposed to improve the junction of the A38/Downside Road/West Lane immediately to the north of the airport's main access roundabout. These improvements have been refined through discussions with NSC and would deliver a significant increase in capacity to fully accommodate growth to 12mppa along with the provision of new pedestrian and cycle crossing facilities.
- 1.1.8 It has been demonstrated that the overall package of measures proposed by BAL to support the 12mppa application will mitigate the highway impacts of this growth.
- 1.1.9 Comprehensive independent review by NSC officers, their consultants, Jacobs, Highways England (HE) and their consultants endorsed the methodology and the findings of the Transport Assessment Report and supporting supplementary information.
- 1.1.10 Agreement was reached with HE that the traffic impacts of the development on the M5 motorway were acceptable subject to an improvement at J21 being implemented prior to passenger numbers exceeding 11mppa.
- 1.1.11 Prior to the committee, agreement had also been reached with NSC that the proposed A38 improvement scheme, signal timing changes at the A38/Barrow Street junction and a contribution towards an A370/SBL junction study proportionately mitigated the traffic impacts of the development, and that the impacts elsewhere would not be severe.
- 1.1.12 Parking demand at the airport has steadily risen with passenger numbers, with peak 'on airport' space demand at 16,700 spaces in 2019. This would have been much higher had the BAL investments in PT infrastructure not been successful.
- 1.1.13 BAL has sought to provide a managed level of parking provision to reflect a range of passenger demand and accessibility characteristics whilst continuing to invest in measures and mechanisms to seek to reduce car trips to the airport. As part of the 10mppa consent, BAL proposes to deliver 1800 spaces through MSCP2 (net 400 additional spaces). As part of the 12mppa development, it is proposed to provide 2700 spaces in the lower cost Silver Zone surface parking, and 2150 spaces in MSCP3, a total net addition of 4,600 spaces from current levels.
- 1.1.14 BAL proposes a 'Monitor and Manage' approach to future parking provision to ensure that parking is only provided when needed in parallel with the introduction of measures to reduce car trips to the airport as a part of the ASAS.

## 2 Matters for Appeal

- 2.1.1 The key transport related surface access reasons for refusal (RfR) are:
- 2.1.2 RfR 1 Additional Traffic resulting in adverse environmental impact on communities, specifically  
*...’The further expansion beyond 10mppa now proposed would generate additional noise, **traffic and off airport car parking** resulting in adverse environmental impacts on communities surrounding Bristol Airport and which would have an **adverse impact on an inadequate surface access infrastructure.**’*
- 2.1.3 RfR4: No very special circumstances which outweigh the harm to the Green Belt from **proposed car park expansion**
- 2.1.4 RfR5: **Inadequate public transport provision will not reduce reliance on car resulting in an unsustainable development contrary to the National Planning Policy Framework and policies CS1 and CS10 of the North Somerset Core Strategy 2017**
- 2.1.5 Prior to refusal of the planning application (LPA ref. no. 18/P/5118/OUT), the Committee Report issued by NSC on 10<sup>th</sup> February 2020 identified the key planning issues relevant to the determination of the planning application.
- 2.1.6 Rule 6 statements and wider objections cover additional areas of concern including congestion, highway safety and impact on local roads.
- 2.1.7 Following the Case Management Conference (CMC) that took place on 8<sup>th</sup> March 2021, the Panel of Inspectors for the Bristol Airport Inquiry identified the main transport issues for the appeal as Sustainable Transport, Highway Network and Safety, and Parking Provision. The above RfRs fit within the themes identified in the CMC as discussed further below.

### 2.2 Sustainable Transport: the effects of the proposed development upon sustainable transport objectives

- 2.2.1 NSC RfR 5, Rule 6 parties (NSC, PCAA, XRE) and a number of other objectors suggest that the proposals are contrary to policy since they will not reduce reliance on car trips, that public transport to the airport is inadequate and that BAL’s mode share targets are not ambitious enough. Similarly RfR 1 suggests surface access infrastructure is inadequate.
- 2.2.2 Analysis of CAA data demonstrates that, through it’s partnership working and investment in public transport measures, BAL has developed public transport services that have already significantly reduced reliance on car trips.

- 2.2.3 BAL proposes to invest further into a package of sustainable transport measures in order to achieve an additional shift of 2.5% in PT use. This is an ambitious target given that Bristol Airport already has a much higher PT mode share than similar regional airports, even exceeding that of both Manchester and Birmingham International airports which have the benefit of a railway station.
- 2.2.4 My analysis demonstrates that the measures proposed by BAL, as set out in the draft S106 Heads of Terms, are appropriate and capable of achieving the 2.5% increase in public transport use proposed. It is clear from this that the public transport surface access infrastructure is not inadequate and that further improvements will ensure the proposals fully comply with the NPPF requirements and policies CS1 and CS10 of the North Somerset Core Strategy 2017.

### **2.3 Highway Network: the effects of the proposed development upon the highway network and upon highway safety**

- 2.3.1 NSC RfR 1 suggests that the additional traffic would have an adverse impact on inadequate surface access infrastructure. Rule 6 Parties (NSC, PCAA) and other objectors raise concern regarding junction capacity testing, impacts on local roads and cycle safety.
- 2.3.2 A comprehensive transport and highways impact assessment has been undertaken for the proposals. The scope of the assessment was agreed with NSC officers, their advisors (Jacobs), Highways England officers and their advisors (separate Jacobs team). The impacts of the development were assessed for a future year of 2026 across a wide study area from the M5 in the west to the main routes south of Bristol, as well as local connector routes.
- 2.3.3 Traffic flow forecasts assume a lower PT mode share than is expected to be achieved, and are also based on a series of 'upper estimate' assumptions to ensure a robust assessment of highways impacts.
- 2.3.4 Link flow analysis and junction testing model outputs that were agreed with NSC and HE demonstrate that, whilst the proposal will lead to traffic increases across the study area, these are not of a magnitude that cannot be accommodated on the existing highway network (ie their impact is not severe), other than where junction improvement mitigation schemes have been agreed at the A38/West Lane/Downside Road junction and Junction 22 of the M5. It has been agreed that the former should be delivered early on in the development and that the J22 upgrade is needed prior to 11mppa being exceeded.
- 2.3.5 Revised passenger growth forecasts (prepared by York Aviation) have been tested through the highways assessment process using the same methodology as agreed with NSC and HE but with a later assessment year of 2030 to reflect the impact of the Covid-19 pandemic on air travel. The conclusions of the revised assessment are that, whilst there have been some

changes to the distribution and time of travel of passengers, the overall impacts are similar to those from the 2026 assessment (ie that development impacts are not severe or have been mitigated). HE has confirmed that the revised assessments are acceptable.

- 2.3.6 It is clear from the results of above that the proposals will not have an adverse impact on surface access infrastructure and that improvements are proposed where mitigation is required in full accordance with NPPF and local policy.
- 2.3.7 The transport and environmental impact assessment process also considered highway safety. Accident analysis demonstrates that there are no accident hotspots or specific areas of concern in the agreed study area. The predicted increases in traffic flow are unlikely to significantly increase risk.
- 2.3.8 Conclusions of the TAA and ESA are that there are no significant adverse environmental impacts on communities in terms of pedestrian delay and amenity, driver delay, severance, fear and intimidation or accidents and safety.
- 2.3.9 In addition, the proposed A38 junction improvements introduce new signal controlled crossing facilities for pedestrians and cyclists which is likely to improve safety.

## **2.4 Parking provision: the effects of the proposed development upon parking provision**

- 2.4.1 NSC RfR 1 suggests that the development would generate additional off airport car parking resulting in adverse environmental impacts on communities. RfR4 suggests that there are no very special circumstances which outweigh the harm to the Green Belt from proposed car park expansion in Silver Zone.
- 2.4.2 Rule 6 Parties (NSC, SPLS, BALPA, XRE) and a number of other objectors have queried the need for additional parking particularly in the green belt to the South of the runway (Silver Zone)
- 2.4.3 The planning and sequential test arguments are dealt with in Alex Melling's evidence, but I have considered the demand forecasting and need for on-airport parking.
- 2.4.4 On behalf of BAL, Teneo Consulting prepared a parking demand study to predict the forecast demand for parking at Bristol Airport associated with the 12mppa application. NSC officers and their advisors reviewed the forecasting approach and agreed that the approach taken was robust. In 2019, some 17,700 spaces were available on site, and peak summer demand reached 16,600, approaching practical capacity. An estimated additional 4,800 off-site non-BAL spaces (2017) had been set up by third party competition due to increased demand for lower cost parking. Many of these are believed to operate without planning consent or lawful development certificates.

- 2.4.5 Teneo have since updated the forecasts to reflect the York Aviation revised passenger growth forecasts, and to reflect a 2.5% increase in PT mode share relative to the 2019 base surveys. The forecasts demonstrate a future demand of some 22,200 on-airport spaces for 12mppa. This sits against a current available supply of 17,700 spaces, with planning permission for up to 18,700 spaces including a further multi storey car park north of the terminal as part of the 10mppa application (MSCP2).
- 2.4.6 It is not possible to accommodate the predicted shortfall in demand for parking without expansion of the lower cost parking in Silver Zone. BAL proposes to construct an additional 2,700 space car park in Silver Zone, and a 2,150-space MSCP to the north of the terminal proving a net increase in parking of 4,600 spaces against current supply to 22,300 spaces. In the context of a balanced surface access strategy, additional affordable and premium on-site parking plays a role in managing travel to the airport, particularly in reducing drop-off and taxi trips, and reducing off-airport unauthorised parking.

## 3 Conclusions

- 3.1.1 Bristol Airport is well served by public transport and is proposing to invest in further improvements as part of a new Surface Access Strategy. The airport already achieves a PT mode share of some 22%, significantly higher than many other regional airports, and has set an ambitious target to increase this further by 2.5%.
- 3.1.2 The proposed Surface Access Strategy measures, as set out in the Draft S106 can achieve a 2.5% increase in the proportion of passenger trips made by public transport.
- 3.1.3 The traffic impact of the proposals can be accommodated by the existing infrastructure, other than at the A38/Downside Road/West Lane junction where an improvement scheme is proposed. Agreement has been reached with HE regarding the provision of an upgrade of M5 J22 prior to passenger numbers exceeding 11mppa.
- 3.1.4 Parking demand will be accommodated in a controlled and phased manner in the context of the overall Surface Access Strategy. This will be achieved by providing additional lower cost parking in Silver Zone and additional premium parking in a new MSCP north of the terminal.
- 3.1.5 I conclude that the proposals are in accordance with the Policy requirements of NPPF para. 108 and 110 and CS10, Transportation and Movement, of the NSC Core Strategy 2017 since they :
- Deliver a comprehensive highways mitigation package agreed with Highways England and previously agreed with offers and their advisors at NSC
  - Propose significant improvements to public transport services and infrastructure
  - Include a broader package of measures, targets and monitoring to reduce the proportion of car trips to the airport