

BAL response to NSC ‘Transport and Highways Summary Comments’ dated 12 November 2019 including Appendices 1, 2, 3 and 4

NSC ‘Transport and Highways Summary Comments’ dated 12 November 2019	
Section 2: Summary	
NSC Comment/Proposal	BAL Comment/Response
<p>Reference to the outstanding items:</p> <ol style="list-style-type: none"> 1. Transport Assessment – modelling of the A38/A368 junction 2. Airport Surface Access Strategy – full agreement to the details as proposed 3. Car Parking Strategy – review of total quantum 	<ol style="list-style-type: none"> (1) BAL agreed to NSC’s request and have undertaken additional capacity testing. A report has been provided to NSC (and included in the most recent Regulation 25 consultation) which concludes that no mitigation is currently required at this junction. (2) BAL have accepted many of the additional items identified by NSC for inclusion within the ASAS. The proposed early delivery measures would enhance the sustainable nature of the development in transport terms, as well as reducing the traffic and transport impact of the proposed development in planning terms. (3) BAL accepts in principle a review of the total quantum of parking. Detailed comments are provided on this point later in this response.
Section 4: Car Parking Strategy	
NSC Comment/Proposal	BAL Comment/Response
<p>NSC state “<i>Within the assessment there are spaces identified that would be used to compensate loss of spaces during construction activity and it is arguable that this provision is warranted as there are no construction plans for MSCP2</i>”.</p>	<p>BAL remains committed to bringing forward Multi-storey Car Park (MSCP)2.</p>
<p>NSC agrees with the findings of the Parking Demand Study in respect of the factors that will impact the ‘likelihood to park’ moving toward 12mppa.</p>	<p>BAL notes and welcomes this comment.</p>
<p>NSC requires that a total of 3,200 net additional spaces be permitted at consent to take into account an increase in public transport mode share from 15% to 17.5%. This quantum would then be subject to a parking quantum review to be undertaken by BAL that would consider any new evidence derived from enforcement actions on</p>	<p>It is BAL’s view that 3,900 spaces should be consented. Provisionally, however, BAL would agree to a review of this quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.</p>

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<p>unauthorised parking locations and other new factors on total parking quantum including other new market provision. Subject to completion and approval of this review, a further release of 700 spaces (up to a maximum of 3,900 net additional spaces) would be permitted.</p>	
<p>NSC requires car parking to be delivered in phases, linked to a public transport investment programme and then modal share increase. This is as follows:</p> <ol style="list-style-type: none"> 1. Silver Zone extension (Phase 1) full year release and Silver Zone extension (Phase 2) (upon expiration of 10mppa consent and only in tandem with delivery of an agreed set of public transport improvements); 2. MSCP2; 3. MSCP3 at achievement of 16% public transport modal share. 	<p>BAL agrees to the following phasing:</p> <ol style="list-style-type: none"> 1. Silver Zone extension (Phase 1) full year release and Silver Zone extension (Phase 2) 2. MSCP2; 3. MSCP3 at achievement of 16% public transport modal share. <p>BAL has provisionally agreed to significant, early investment in public transport (see the Heads of Terms that accompanies this response) which is alongside the full year release of the Silver Zone extension (phase 1) and delivery of the Phase 2 extension, which reflects the immediate need for lower cost car parking prior to a passenger throughput of 10mppa.</p>
<p>NSC state that <i>“when considering the attraction of official parking over unauthorised sites, price appears to be the dominant driver over other factors such as security and convenience. Therefore, the act of simply providing more official car parking without any consideration of the pricing structure would be unlikely to reduce the demand off-site”</i>. NSC require a multi modal pricing strategy to be undertaken with the aim of moving passengers up the mode hierarchy and away from unauthorised car parking. This should directly inform ASAS and Travel Plan actions. NSC state that the ASAS will not be signed off until the pricing strategy is agreed.</p>	<p>Research undertaken by BAL indicates that, whilst price is an important consideration, other factors such as convenience, safety and security are also important to a passenger’s choice of parking product. This is further evidenced by the fact that official airport car parks operate at or near capacity at many points of the year including during the Christmas period when off-site demand is considerably lower.</p> <p>BAL already operates a pricing strategy which is responsive to levels of demand and complements its Airport Surface Access Strategy (ASAS). Pricing is complex; for example, any increase in parking charges will also increase the attractiveness of unauthorised sites whilst, conversely, reducing prices may discourage the use of public</p>

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	<p>transport. Further, it should also be noted that BAL does not control or have influence over all charging such as off-site parking, taxis and the majority of public transport services. In consequence, our ability to develop and implement a holistic charging strategy is significantly restricted.</p> <p>Notwithstanding this, BAL provisionally agrees to prepare a multi-modal pricing review that will inform the ASAS.</p>
<p>NSC requires a condition/Section 106 obligation that provides incentives for BAL to achieve agreed mode share targets. NSC state that these should be, in order of priority:</p> <ol style="list-style-type: none"> 1. Additional funding of public transport measures/services; 2. A comprehensive review of the ASAS and Travel Plan, which should be used if incentive one fails; 3. A rollback of approved parking provision commensurate with the public transport mode share achieved. This measure is to be used if there is repeated failure in the delivery of the above incentives. 	<p>BAL accepts measures 1 and 2; however, we consider that an approach that links parking quantum to modal share would be inappropriate for the reasons set out below:</p> <ul style="list-style-type: none"> • This simplistic approach fails to take full consideration of the parking hierarchy. For example, in transport hierarchy terms, increasing DOZ charges should result in a reduction in demand for drop-off/taxi (four journeys to/from airport), but may increase parking. This is a positive in terms of transport hierarchy and wider transport impact. Mechanisms exclusively looking at parking numbers and public transport over-simplify a complex picture. • BAL is fully committed to enhancing sustainable surface access and has provisionally agreed to a stretching 17.5% public transport modal share target that goes beyond the 15% target assessed as being acceptable in the Transport Assessment submitted in support of the planning application. • BAL has provisionally accepted a condition (to be drafted) linking the future use of MSCP3 on Bristol Airport reaching 16% public transport mode share and its capacity would be subject to review at that point. In consequence, mechanisms already exist to control the delivery of car parking.

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	<ul style="list-style-type: none"> • Through the ASAS and Airport Transport Forum, BAL proposes that progress against the stretch target of 17.5% is monitored using annual KPIs with corrective action being taken if progress is not being made. This will help to ensure that the public transport investment measures implemented are effective. • BAL does not have direct control over the propensity for passengers to use public transport and whilst the significant public transport investment BAL is committing to deliver through its ASAS will encourage sustainable travel, the associated increase in public transport modal share will take time to realise. Further, there are factors outside of BAL’s control that influence the delivery of the ASAS objectives and in turn modal share, for example third-party off-site parking provision (consented or otherwise). A penalty scheme could therefore lead to a situation that unduly penalises BAL. • The removal of parking spaces will almost certainly not lead to a corresponding increase in public transport use and a reduction in demand for car parking. It would, however, be likely to lead to increased demand for unauthorised off-site car parks. • The practicalities of implementing such a penalty scheme are unclear and this would be extremely difficult for BAL to manage from an operational perspective where parking spaces are booked in advance.
Section 5: Airport Surface Access Strategy	
NSC Comment/Proposal	BAL Comment/Response
Fifth bullet point (third sub-bullet point) – the new demand responsive services to be launched and operated on a 24-month trial basis, with review periods every six months.	BAL agrees to launch the proposed services to Nailsea (via Backwell) and to Clevedon (via Yatton). The services would be part of the ASAS measures, and as such they should contribute towards the modal shift targets to be set out and agreed within the ASAS. The six-monthly review periods should be used to assess whether the

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	services are contributing towards the ASAS objectives and the steering group should respond as appropriate. The purpose of the trial period is to establish whether a longer-term solution is feasible. If the service does not prove to be viable, and is not contributing to delivery of the ASAS objectives, the steering group should determine whether the service is continued or requires support from the Public Transport Improvement Fund.
Fifth bullet point (fourth sub-bullet point) – reference to the DRT booking platform and longer term MaaS platform	BAL agrees that a booking platform will be a positive step in ensuring that the demand responsive services are successful and agrees to support development of the platform with the operator. For the longer term MaaS platform, BAL agrees to support the wider regional scheme. See further details in the proposed S106 early delivery measures.
Fifth bullet point (sixth sub-bullet point) – reference to future direct Metrobus services	BAL agrees that the proposed Metrobus improvement measures, as detailed within the proposed S106 early delivery measures, would provide potential future opportunities for further connectivity. BAL supports the principle of potential further developments of the Metrobus network to create direct services to the airport, however any such opportunities would need to be properly reviewed and assessed by the steering group at the appropriate time and would be subject to securing necessary approvals.
Fifth bullet point (eighth sub-bullet point) – reference to ring fencing use of the revenue from increased drop-off zone charges.	BAL has implemented the increased prices for the drop-off zone. BAL has also made a commitment to a carbon offset programme, as well as making significant investment in surface access at the airport, as set out within the proposed early-delivery S106 measures and within the emerging ASAS. BAL does not therefore consider it necessary to impose any such ring-fencing of budgets as proposed.
Fifth bullet point (tenth/last sub-bullet point) – reference to 100% of taxi provision (contracted) at the airport being EV by 2025, with 50% achieved by 2023.	BAL accepts the principle of setting ambitious and challenging targets for taxi operations at the airport to minimise greenhouse gas emissions as far as possible. BAL agrees to publish an Ultra-Low

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	Emission Strategy, which would be agreed with NSC, and explore the potential for a highly ambitious target for EV taxi journeys. Our proposed early-delivery S106 measures sets out a proposed target of 75% of all taxi journeys to be operated using fully electric or electric hybrid vehicles. This target would be reflected in the tender for BAL’s contracted taxi-provider, when that existing contract is re-let.
Other commitments (first bullet point) – reference to quantum of EV charging points should relate to the quantum and type relative to the national or sub-regional.	Further consideration is needed on this point and would be reflected on within the Ultra-Low Emission Strategy to be brought forward. Airports are unique cases in terms of parking demand and the type of parking. It may not therefore be appropriate to link the quantum and type of charging points in this way. BAL do however accept the principle of meeting the demand for EV charging, relative to the national or sub-regional fleet.
Other commitments (second bullet point) – reference to a time limit of 20 minutes for car share and taxis within the new Waiting Zone facility.	The new Waiting Zone facility has been implemented as part of the wider Parking Summit Action Plan, which seeks to reduce the impact of vehicles parking and waiting on local roads. This work is being delivered in conjunction with stakeholders, including local parish councils. The Waiting Zone currently has a tariff which allows one hour of free parking before higher charges are applied, with no return within one hour. A time limit of only 20 minutes would be insufficient to encourage taxi operators to use the facility and would therefore work against the objectives of the Parking Summit project. However, BAL would agree to undertake a review of the Waiting Zone facility as part of the ongoing Parking Summit work, in conjunction with NSC and the wider stakeholders involved in the project.
Section 6: Monitoring Strategy Requirements	
NSC Comment/Proposal	BAL Comment/Response
Recommendations for the monitoring strategy.	BAL accepts the requirement for a monitoring strategy and agrees to submit a proposed monitoring strategy to NSC within six months of

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	planning consent in order to agree the details and methodology of the strategy.

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Section 2: Hierarchy of users/modes	
Reference to a proposed hierarchy of modes.	BAL agrees that a transport mode hierarchy would be included within the ASAS, with an objective to move as many people as possible higher up the hierarchy. BAL notes the hierarchy as proposed by NSC and BAL will take this into account in preparation of the draft ASAS to be submitted. All final conditions agreed with NSC should also recognise the role that the transport hierarchy will play in influencing travel patterns.
Section 3: Sustainable Travel (Electric Vehicles (EVs) and EV Charging)	
Actions – request that BAL set out a breakdown of proposed EV charging, as well as plans and timetable for taxi and fleet replacement with EVs.	BAL agrees to include a breakdown within the Ultra-Low Emission Strategy that will be submitted to NSC.
Action – request that EV charger infrastructure is provided so that, as a minimum, charging infrastructure keeps pace with the proportions of the national and sub-regional fleet for both passengers and staff.	BAL accept this approach and this will be reflected within the Ultra-Low Emission Strategy to be prepared.
Action – when the BAL taxi contract is re-tendered, NSC require 100% of all taxi provision within the contract to be EV by the end of 2025, with 50% achieved by 2023.	BAL accepts the principle of setting ambitious and challenging targets for taxi operations at the airport to minimise greenhouse gas emissions as far as possible. BAL agrees to publish an Ultra-Low Emission Strategy, which would be agreed with NSC, and explore the potential for a highly ambitious target for EV taxi journeys. Our proposed early-delivery S106 measures sets out a proposed target of 75% of all taxi vehicles to be operated using fully electric or electric hybrid vehicles. This target would be reflected in the tender for BAL’s contracted taxi-provider, when that existing contract is re-let.
Section 3: Sustainable Travel (Public Transport)	

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NSC is not supportive of BAL maintaining the commitment to ensure that 15% of airport passengers travel by public transport and instead propose a higher target of 17.5%.	BAL are able to support NSC’s proposed increase in public transport mode share as a stretch target and this would be reflected within the ASAS. It should be noted that the Transport Assessment which accompanied the planning application identified the traffic impact associated with the proposal at the lower level of 15% public transport use, and this was the basis for the conclusions within the Transport Assessment that the traffic impact would be acceptable. With the proposed higher figure of 17.5%, this would result in a lower residual level of traffic, with an associated lower level of traffic impact as a result.
Proposal A – The Bristol Flyer to be integrated in Metrobus within two years of planning consent.	BAL are supportive of this measure and this is reflected within the proposed early-delivery measures for the ASAS. It should be noted that this work would be subject to a feasibility study and approval by the appropriate Metrobus governance authorities.
Proposal F – Reference to ensuring current services are developed into viability where this is not currently the case	BAL are committed to ensuring that the strategic public transport connections that were brought forward as part of the 10mppa development are maintained. These include the important connections to Bath, Bristol, Weston-super-Mare, South Wales and to Somerset/Devon. The ASAS will prioritise those services that contribute to achieving the modal shift target and funding support through the Public Transport Improvement Funds will be prioritised accordingly.
Action – third bullet point – reference to the 0.5% per annum mode share increase.	BAL support this approach as a suitable KPI to inform the steering group, rather than a hard ‘target’. The KPI should be applied in a manner which recognises the growth trajectory of achieving modal shift. BAL would therefore support the steering group overseeing an ‘average’ of 0.5% modal shift increase per annum and taking a measured view on how improvements are progressing, recognising

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	that some projects will take time to establish themselves and deliver modal shift.
Section 4: Illegal Parking/ Enforcement	
NSC recommends that BAL finalises its Parking Summit commitments through the Section 106 and that measures are submitted within one month of consent being granted. NSC states that <i>“Development should not proceed until the scheme has been approved”</i> .	<p>BAL assumes that the one month period referred to in NSC’s comments is for the submission of details in respect of how it intends to provide funding only. BAL does not consider that this is realistic and would instead suggest that six months would be more appropriate. BAL is committed to delivering the Parking Summit actions, and indeed has delivered on all of the individual commitments within the Action Plan within BAL’s sole control, however it should be noted that NSC (as the Highway Authority) will need to lead on some aspects of this work, such as TRO implementation.</p> <p>It should be noted that BAL will provide a contribution to resources and will facilitate stakeholder engagement. It is not within BAL’s remit to implement a Traffic Regulation Order (TRO) and therefore it would be unjust to require approval of a scheme that is outside of BAL’s control.</p>
Action - BAL should continue their ongoing commitment to work to implement the measures as set out in the Parking Summit in partnership with NSC and other stakeholders. NSC will comment on TROs and design. The airport and their consultant(s) are leading and will provide resources to progress the design and implementation of proposals and consultations with stakeholders/communities.	As per the Heads of Terms submitted alongside this response, BAL will provide resource and accommodate discussions with local parish councils and stakeholders; however, our offer is on the basis that NSC will lead on the assessment, implementation and delivery of TRO measures. In its Parking Strategy comments (see below), Jacobs agrees that this is an appropriate approach.
Action - Funding for an enforcement officer for 5 years (to be employed by the Council) to be funded by BAL, to be secured through planning condition.	As per the Heads of Terms submitted alongside this response, BAL agrees to provide a £225k contribution towards NSC civil parking enforcement resources.
Section 5: Drop off and taxi provision	

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NSC states that free drop off parking should be strictly enforced for limited periods (NSC suggests a maximum stay of 20 minutes for drop off) to limit the growth of this type of travel.	The new Waiting Zone facility has been implemented as part of the wider Parking Summit Action Plan, which seeks to reduce the impact of vehicles parking and waiting on local roads. This work is being delivered in conjunction with stakeholders, including local parish councils. The Waiting Zone currently has a tariff which allows one hour of free parking before higher charges are applied, with no return within one hour. A time limit of only 20 minutes would be insufficient to encourage taxi operators to use the facility and would therefore work against the objectives of the Parking Summit project. However, BAL would agree to undertake a review of the Waiting Zone facility as part of the ongoing Parking Summit work, in conjunction with NSC and the wider stakeholders involved in the project.
NSC states that in addition to the time limited nature of the new Waiting Zone facility in the Silver Zone car park, increased charging should be applied at the drop off zones closer to the terminal to deter usage, with the income permanently ring-fenced for carbon offsetting measures.	BAL has implemented the increased prices for the drop-off zone, and will continue to review charges as part of future parking reviews. BAL has also made a commitment to a carbon offset programme, as well as making significant investment in surface access at the airport, as set out within the proposed early-delivery S106 measures and within the emerging ASAS. BAL does not therefore consider it necessary to impose any such ring-fencing of budgets as proposed.
Actions - BAL to finalise their considerations and advance firm proposals within the ASAS for the operation and charging regime for the drop off zones for passengers and taxis and the parking charges associated with each area near the terminals.	As noted above, BAL will review the operation of the new Waiting Zone facility as part of the preparation of the ASAS and will undertake a multi-modal pricing review.
Section 6: Car Parking Provision	
NSC states that it does not <i>“feel that additional provision above 3,900 is warranted as there are no construction plans for MSCP2 and off-site provision may vary greatly in location, type and authorisation status throughout the period to 2026, and is not predictable and so should</i>	It is BAL’s view that 3,900 spaces should be consented. Provisionally, however, BAL would agree to a review of this quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.

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Action/Comment	BAL Response
<i>better be accounted for in a review of actual changes in provision as provided for in our recommendations”.</i>	
NSC agrees with the findings of the Parking Demand Study in respect of the factors that will impact the ‘likelihood to park’ moving toward 12mppa.	BAL notes and welcomes this comment.
Action - BAL to amend their proposals for additional parking to a maximum number of 3,200 net spaces by 12mppa. NSC state that parking provision should be re-evaluated by BAL on this basis and space reductions in specific car parks proposed.	As set out above, BAL would agree to a review of the quantum of parking for the full use of the 3,900 consented spaces.
Action - A review (with methodology to be agreed with NSC) be undertaken by BAL if seeking to justify any parking above 3,200 spaces – to a maximum of 3,900 additional spaces only.	As set out above, BAL would agree to a review of the quantum of parking for the full use of the 3,900 consented spaces.
Action - Detail should be provided of early investment and provision of public transport improvements (which are to be brought forward in tandem with proposals for car parking expansion), particularly in the first two years.	In response to this action, BAL has proposed a programme of significant, early investment in public transport. This is set out in the proposed Heads of Terms submitted alongside this response.
Action - The ASAS should review price structures across all transport to both promote use of more sustainable modes and to deter illegal off-site parking practices.	<p>Research undertaken by BAL indicates that, whilst price is an important consideration, other factors such as convenience, safety and security are also important to a passenger’s choice of parking product. This is further evidenced by the fact that official airport car parks operate at or near capacity at many points of the year including during the Christmas period when off-site demand is considerably lower.</p> <p>BAL already operates a pricing strategy which is responsive to levels of demand and complements its ASAS. Pricing is complex; for example, any increase in parking charges will also increase the attractiveness of unauthorised sites whilst, conversely, reducing prices may discourage the use of public transport. Further, it should</p>

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Action/Comment	BAL Response
	<p>also be noted that BAL does not control or have influence over all charging such as off-site parking, taxis and the majority of public transport services. In consequence, our ability to develop and implement a holistic charging strategy is significantly restricted.</p> <p>Notwithstanding the above, BAL agrees to prepare a multi-modal pricing review.</p>
<p>Action - A clear timescale for construction of the public transport interchange, which was consented as part of the 10mppa application, be confirmed.</p>	<p>BAL fully recognises the importance of ensuring that there are appropriate facilities on site to encourage and promote sustainable modes of travel. In this regard, BAL has recently opened a new coach area providing suitable additional capacity.</p> <p>BAL is currently exploring options to bring forward the early delivery of a public transport interchange, potentially ahead of MSCP2. The public transport interchange will be located in close proximity to the terminal building and will provide a passenger experience equal to, or better than, that proposed under the extant consent for 10mppa. Subject to obtaining necessary approvals, BAL currently anticipates that construction of the public transport interchange will commence within 12 months of consent being granted (to allow for the detailed design of the scheme, procurement of contractors and consultation with NSC) with completion within circa 30 months (taking into account the need to obtain any approvals and the phasing of works).</p> <p>Further to NSC’s comment, BAL will seek to discuss a potential Section 106 obligation relating to the delivery of the public transport interchange with officers.</p>

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<p>Action - Agreement of monitoring regime and associated incentives to ensure a suitable measurement and understanding of shift towards sustainable modes.</p> <p>NSC state that any decline in the mode share will result in the application of the following actions (in order of priority):</p> <ol style="list-style-type: none"> 1. Additional PT funding. 2. A comprehensive review of the ASAS and Travel Plan, which should be used if incentive one fails. 3. A rollback of approved parking provision of 128 spaces per 0.1% fall in public transport mode share percentage points. This final method should be used if there is repeated failure of the above incentives. 	<p>BAL accepts measures 1 and 2; however, we consider that an approach that links parking quantum to modal share would be inappropriate for the reasons set out below:</p> <ul style="list-style-type: none"> • This simplistic approach fails to take full consideration of the parking hierarchy. For example, in transport hierarchy terms, increasing DOZ charges should result in a reduction in demand for drop-off/taxi (four journeys to/from airport), but may increase parking. This is a positive in terms of transport hierarchy and wider transport impact. Mechanisms exclusively looking at parking numbers and public transport over-simplify a complex picture. • BAL is fully committed to enhancing sustainable surface access and has provisionally agreed to a stretching 17.5% public transport modal share target that goes beyond the 15% target assessed as being acceptable in the Transport Assessment submitted in support of the planning application. • BAL has provisionally accepted a condition (to be drafted) linking the future use of MSCP3 on Bristol Airport reaching 16% public transport mode share and its capacity would be subject to review at that point. In consequence, mechanisms already exist to control the delivery of car parking. • Through the ASAS and Airport Transport Forum, BAL proposes that progress against the stretch target of 17.5% is monitored using annual KPIs with corrective action being taken if progress is not being made. This will help to ensure that the public transport investment measures implemented are effective. • BAL does not have direct control over the propensity for passengers to use public transport and whilst the significant public transport investment BAL is committing to deliver through

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	<p>its ASAS will encourage sustainable travel, the associated increase in public transport modal share will take time to realise. Further, there are factors outside of BAL’s control that influence the delivery of the ASAS objectives and in turn modal share, for example a third-party off-site provision. A penalty scheme could therefore lead to a situation that unduly penalises BAL.</p> <ul style="list-style-type: none"> • The removal of parking spaces will almost certainly not lead to a corresponding increase in public transport use and a reduction in demand for car parking. It would, however, be likely to lead to increased demand for unauthorised off-site car parks. • The practicalities of implementing such a penalty scheme are unclear and this would be extremely difficult for BAL to manage from an operational perspective where parking spaces are booked in advance.
NSC states that no new parking proposed as part of the planning application can come forward until the ASAS is approved.	BAL does not consider that it is necessary to link the delivery of car parking with agreement of the ASAS. This is because BAL has already provisionally agreed to bring forward early investment in public transport alongside car parking provision (see the Heads of Terms that accompanies this response). Further, in-line with Government policy, the ASAS is to be developed with the Airport Transport Forum and, therefore, wider approval will be required.
Section 8: Staff transport provision	
Actions – fourth bullet point – request that BAL look at including the main aims of the Future Mobility Zone within the S106, should the bid be unsuccessful	Whilst BAL are fully supportive of WECA’s bid to the Future Mobility Zone fund, it would not be feasible or appropriate for BAL to bring forward these schemes in isolation. Should the bid be unsuccessful, there will be elements of the bid that can be brought forward at a more local level to the airport, such as the demand responsive services, and these will be reflected within the ASAS.

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Section 10: Monitoring	
Action – BAL should propose monitoring and review methodologies and schedules in reflection of our comments to inform the S106 Heads of Terms drafting and/or planning conditions and/or incorporated in the draft ASAS.	<p>BAL agreed with the principles of the monitoring approach that has been set out by NSC. A full monitoring plan would be prepared by BAL and set out within the ASAS. The monitoring plan will include the methodology for monitoring the following:</p> <ul style="list-style-type: none"> • Percentage of airport passengers using public transport • Percentage of airport employees using sustainable transport • Highway traffic at key locations

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APPENDIX 2: Transport Assessment and Modelling (dated 11 October 2019)	
Jacobs Technical Note	
Report Section	BAL Response
Section 11: Conclusions	
<p>Final conclusion:</p> <p>Areas yet to be agreed are as follows:</p> <ol style="list-style-type: none"> 1. The ability of airside operations to adequately handle the proposed 12mppa flight schedule 2. Whether the flight schedule as modelled is robust vs the established daily temporal profile 3. The robustness of the dwell time data for departing passengers 4. The need for mitigation at the A38/Barrow Street junction 5. The need for junction assessment at the A370/SBL and A38/A368 junctions 	<p>BAL would respond to these conclusions as follows:</p> <ol style="list-style-type: none"> 1. BAL have provided additional information on this and welcome that Jacobs now conclude that they have confidence in the capacity. 2. The flight schedule has been independently verified by Mott MacDonald as being a reasonable and robust future forecast. Providing a direct uplift in flights would not have represented a realistic scenario. 3. The dwell time data has been discussed at length with Jacobs, with information supplied to explain the nature of the data set and the reason for some apparent anomalies with the data, resulting from occasional special circumstances. Overall the data set is considered to provide a very good and reliable indication of dwell time at BRS and BAL welcome that Jacobs acknowledge that this is a significant volume of records to base the assessment upon. 4. BAL do not accept that mitigation is required at A38/Barrow Street junction, based on the findings of the TA or Jacobs' own review. However, in recognition of the concern, BAL have agreed to include this junction within the Traffic Monitoring Plan to be agreed. 5. Similarly, BAL do not accept that mitigation is required at these junctions, and Jacob's report does not provide technical evidence to support this. However, in recognition of this concern, BAL are happy to deal with these junctions as proposed within the S106 measures.

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APPENDIX 3: Car Parking Strategy Review (dated October 2019)	
Jacobs Report	
Section	BAL Response
1.2 10mppa Consented Parking Provision	
Para 2	Jacobs state that MSCP2 is not currently scheduled for construction. BAL disagrees with this comment and remains committed to bringing forward MSCP2.
1. Parking Demand	
2.1.1 Future Demand Forecast	
Para 6	BAL notes Jacobs’ recognition that a public transport mode share increase to 29% would be unrealistic within the timescales of growth to 12mppa.
2.1.2 Public Transport Improvements	
Para 4	<p>BAL notes that Jacobs agree with NSC’s opinion that the 15% public transport mode share target proposed in the Transport Assessment is not sufficiently ambitious and supports a stretch target of 17.5%.</p> <p>The Transport Assessment submitted in support of the planning application has demonstrated that a public transport mode share of 15% at 12mppa would result in an acceptable development in planning terms. Notwithstanding this, BAL has provisionally agreed to a stretching 17.5% target with significant early investment in public transport. It should be noted that the higher percentage of public transport use would subsequently reduce the volume of other vehicular traffic.</p>
Para 4	<p>Jacobs comment that the mode share target “<i>should also be considered within the context of the airport’s public future growth plans prior to which a step change in the public’s mindset about travel to the airport is required</i>”.</p> <p>BAL does not consider it appropriate for Jacobs to make reference to longer term growth beyond 12mppa. This is outside the scope of the planning application and is not a material planning consideration, particularly as Bristol Airport’s Final Master Plan has not been published.</p>
Para 4	<p>BAL notes the comment that “<i>given the airport’s location in the Green Belt, it is not feasible to suggest that continued onsite expansion of car parking will be permitted as the airport grows further</i>”.</p> <p>It should be noted that only part of the Bristol Airport site is currently in the Green Belt. Further, BAL does not consider it appropriate for Jacobs’ comments to refer to growth beyond 12mppa and, additionally, we would contend that it is wholly</p>

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	inappropriate for Jacobs to pre-determine the acceptability of any future development proposals. Indeed, the NSC Local Plan Issues and Options document has set out options for the Green Belt in the vicinity of the airport to be reviewed.
Para 4	Jacobs contend that at 17.5% public transport modal share, the quantum of car parking spaces to be provided to support 12mppa should reduce from 3,900 to 3,200. This is a simplistic calculation and ignores and undermines the transport hierarchy approach proposed by officers. Provisionally, however, BAL would agree to a review of the quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.
Para 6	<p>Jacobs state <i>“To ensure unrestricted parking increase does not occur at the expense of PT the release of additional spaces should, as a proactive measure, be linked upfront PT funding.”</i></p> <p>BAL agrees to the release of car parking in parallel with early investment in public transport. The proposed Heads of Terms submitted alongside this response has been prepared on this basis.</p>
Para 7	<p>Jacobs propose three options to incentivise an increase in public transport mode share, as follows:</p> <ol style="list-style-type: none"> 1. Additional PT funding. 2. A comprehensive review of the ASAS and Travel Plan, which should be used if incentive one fails. 3. A rollback of approved parking provision commensurate with the PT target achieved, which should be used if there is repeated failure of the above incentives. <p>BAL accepts options 1 and 2; however, we consider that an approach that links parking quantum to modal share (Option 3) would be inappropriate for the reasons set out below:</p> <ul style="list-style-type: none"> • This simplistic approach fails to take full consideration of the parking hierarchy. For example, in transport hierarchy terms, increasing DOZ charges should result in a reduction in demand for drop-off/taxi (four journeys to/from airport), but may increase parking. This is a positive in terms of transport hierarchy and wider transport impact. Mechanisms exclusively looking at parking numbers and public transport over-simplify a complex picture. • BAL is fully committed to enhancing sustainable surface access and has provisionally agreed to a stretching 17.5% public transport modal share target that goes beyond the 15% target assessed as being acceptable in the Transport Assessment submitted in support of the planning application.

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	<ul style="list-style-type: none"> BAL has provisionally accepted a condition (to be drafted) linking the future use of MSCP3 on Bristol Airport reaching 16% public transport mode share and its capacity would be subject to review at that point. In consequence, mechanisms already exist to control the delivery of car parking. Through the ASAS and Airport Transport Forum, BAL proposes that progress against the stretch target of 17.5% is monitored using annual KPIs with corrective action being taken if progress is not being made. This will help to ensure that the public transport investment measures implemented are effective. BAL does not have direct control over the propensity for passengers to use public transport and whilst the significant public transport investment BAL is committing to deliver through its ASAS will encourage sustainable travel, the associated increase in public transport modal share will take time to realise. Further, there are factors outside of BAL’s control that influence the delivery of the ASAS objectives and in turn modal share, for example a third-party off-site provision. A penalty scheme could therefore lead to a situation that unduly penalises BAL. The removal of parking spaces would be likely to lead to increased demand for unauthorised off-site car parks. The practicalities of implementing such a penalty scheme are unclear and this would be extremely difficult for BAL to manage from an operational perspective where parking spaces are booked in advance.
2.1.4 Impact of Increased Demand on Off Site Unauthorised Parking	
Para 3	<p>Jacobs state that the Parking Demand Study “<i>does not provide an assessment of the potential impact of a reduction in off-site parking on value for money for airport passengers, given that it would increase BALs dominance over airport parking. Furthermore, the study does not consider other interventions, such as a step change in PT provision and enhanced and enforced parking restrictions, which could be used to limit parking demand for authorised parking</i>”.</p> <p>BAL does not consider that impacts on ‘value for money’ are a material planning consideration. However, the Parking Demand Study does indicate that in order to negate the need for the Silver Zone car park extension (Phase 2), a public transport modal share of circa 29% would be required, which Jacobs have concluded would be unrealistic.</p>
2.1.5 Future Capacity Requirements	
Para 2	<p>Jacobs contend that at 17.5% public transport modal share, the quantum of car parking spaces to be provided to support 12mppa should reduce from 3,900 to 3,200. This is a simplistic calculation and ignores and undermines the transport hierarchy approach proposed by officers. Provisionally, however, BAL would agree to a review of the quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.</p>

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2.1.6 Benchmarking Using Similar Airports	
General	<p>BAL considers that it is misleading to benchmark BAL’s parking proposals and public transport modal share with other UK airports for the reasons alluded to by Jacobs in its comments including passenger profile, environmental constraints, public transport links and mass transit. Further, as highlighted by Jacobs, the method by which Bristol Airport’s public transport mode share is measured differs from that used by other airports. We would also add that the benchmarking undertaken by Jacobs has only considered a limited number of airports which appear to have been selected at random.</p> <p>Notwithstanding the above, the Transport Assessment has demonstrated that a public transport mode share of 15% at 12mppa would result in an acceptable development in planning terms.</p>
2.1.6.1 Edinburgh Airport	
Para 1	BAL notes that Jacobs identifies that Edinburgh Airport may be a “ <i>good comparator for Bristol</i> ”. We would disagree with this assertion given that the airport is served by a tram and, further, that the airport has a higher proportion of inbound tourist passengers that are less likely to travel by private car.
Para 3	<p>Jacobs state that, in the context of Edinburgh Airport, “<i>more action could be taken to increase Bristol Airport’s public transport offering and that third-party car parking sites should be included within its offering when reviewing the total car parking facilities available</i>”.</p> <p>BAL is fully committed to enhancing sustainable surface access. With specific regard to third-party car parking, offsite park and ride locations have been considered in preparing the Parking Strategy and no viable and suitable options have been identified.</p>
2.1.6.2 Birmingham Airport	
General	Given the inherent differences between Bristol Airport and Birmingham Airport that are recognised in Jacobs’ comments, we do not feel that reference to Birmingham Airport is helpful nor adds to the analysis.
2.1.6.3 Glasgow Airport	
Para 2	BAL questions the assertion in respect of Glasgow Airport’s ASAS and draft Masterplan that “ <i>it seems reasonable to assume that more ambitious targets would be applied to any future version should the airport envisage a return to growth</i> ”. There is no evidence to support this assumption.
2.1.6.4 Other Airports	

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Para 2	<p>BAL notes the statement “<i>There would appear a danger that providing for disproportionate parking demand at this time may prejudice the need for this shift [to public transport] or potentially a poor investment by BAL should demand reduce in the future because of public transport shift</i>”.</p> <p>BAL does not consider it appropriate for Jacobs’ comments to refer to growth beyond 12mppa which is outside the scope of the planning application and, further, there is no evidence provided by Jacobs to support its assertion. BAL’s proposals for growth to 12mppa have been informed by a robust Parking Demand Study that has identified an appropriate level of car parking for an additional 2mppa and, further, BAL has proposed significant, early investment in public transport. It should also be noted that an undersupply of parking would risk an increase in the use of unauthorised car parks.</p>
2.1.6.5 BAL Benchmark	
Para 2	Again, BAL does not consider it appropriate for Jacobs’ comments to refer to growth beyond 12mppa which is outside the scope of the planning application and is not a material planning consideration.
Para 2	BAL agrees that a new benchmark by which public transport mode share is monitored is required. This will be developed as part of the preparation of the ASAS.
2.2 Parking Demand Study Addendum	
Para 4	Jacobs state that “ <i>pricing policy appears to be the main deterrent for use of official sites driving particular user groups...towards unofficial sites</i> ”. Research undertaken by BAL indicates that, whilst price is an important consideration, other factors such as convenience, safety and security are also important to a passenger’s choice of parking product.
Para 5	BAL notes that Jacobs consider the assessment of reduced seasonality of demand for parking contained in the Parking Demand Study Addendum to be appropriate.
2.3 Parking Demand Study Conclusions	
Para 1	BAL notes that Jacobs “ <i>broadly agrees that the growth assumptions for the airport, which appear robust and are generally a continuation of existing observed trends</i> ”.
Para 3	<p>Jacobs state that “<i>price point is the most likely deterrent for the use of the BAL car parks. Thus, even if the additional capacity is provided, a shift towards the official car park may not occur unless the pricing regime is amended</i>”.</p> <p>Research undertaken by BAL indicates that, whilst price is an important consideration, other factors such as convenience, safety and security are also important to a passenger’s choice of parking product. This is further evidenced by the fact that</p>

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	official airport car parks operate at or near capacity at many points of the year including during the Christmas period when off-site demand is considerably lower. In consequence, increasing the provision of lower cost parking is fully expected to lessen the demand for unauthorised car parks, particularly when implemented alongside measures proposed by BAL to tackle illegal parking activity.
Para 4	BAL notes that Jacobs consider the targets for public transport modal share proposed by BAL to be not sufficiently ambitious; however, no evidence has been provided to substantiate this assertion. The Transport Assessment has demonstrated that a public transport mode share target of 15% at 12mppa would result in an acceptable development in planning terms. Notwithstanding this, BAL has provisionally agreed to a stretching public transport mode share target of 17.5%.
Para 4	It is BAL’s view that 3,900 spaces should be consented. Provisionally, however, BAL would agree to a review of this quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.
2. Parking Strategy	
Para 2	It is BAL’s view that 3,900 spaces should be consented. Provisionally, however, BAL would agree to a review of this quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.
Para 4	<p>Jacobs state <i>“Given that MSCP2 is proposed within the airport’s Green Belt Inset the construction of this facility should take precedence over additions elsewhere and hence prior to the opening of any parking facilities proposed in the 12mppa application”</i>.</p> <p>This is not accepted by BAL, for the following reasons:</p> <ul style="list-style-type: none"> • BAL remains committed to maximising development in the Green Belt inset and will bring forward MSCP2 when there is sufficient demand to make such a significant investment viable. • Planning permission for MSCP2 has already been granted. Further, in accordance with the National Planning Policy Framework (NPPF), ‘very special circumstances’ have been clearly demonstrated to justify car parking provision in the Green Belt, which is required regardless of whether MSCP2 is delivered because of the demand for lower cost parking. A failure to meet this demand will result in the increased use, and impact, of unauthorised car parks. • Requiring the delivery of MSCP2 would not reflect the nature of parking demand nor the commercial reality of operating an airport and would therefore be clearly contrary to the NPPF. The timing of the delivery of such a significant investment is, and should remain, a business decision. Commercial considerations were previously

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	<p>accepted by NSC as representing a very special circumstance to justify bringing forward the existing Silver Zone car park extension (Phase 1) ahead of MSCP Phase 1. In this case, the Planning Officer’s report stated that it would be <i>“unrealistic... to suppose that any business would front load expensive infrastructure much larger and much sooner than is reasonably needed”</i>. This view was upheld in the refusal of an application for Judicial Review challenging the Council’s granting of consent in which the claimant contested that the decision had inappropriately taken into account BAL’s pricing strategy. In refusing permission to proceed, My Justice Hickinbottom stated: <i>“In concluding that there were very special circumstances in 2016, the Council was entitled to take into account the different economic trends and requirements then shown.”</i></p> <ul style="list-style-type: none"> • The early, full release of the Silver Zone extension (Phase 1) and delivery of Phase 2 are required in part to help compensate for the loss of spaces associated with the construction of the MSCP2/public transport interchange. • Importantly, this statement is not in accordance with the phasing set out in NSC’s comments (above) which identifies the immediate full year release of the Silver Zone extension (Phase 1) and delivery of the Silver Zone extension (Phase 2), alongside early investment in public transport as a first phase. This phasing responds to the immediate need for lower cost car parking, as identified in Parking Demand Study.
3.1 Comparison with Demand Studies	
Para 1	It is BAL’s view that 3,900 spaces should be consented. Provisionally, however, BAL would agree to a review of this quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.
3.2 Review of Potential Car Parking Locations	
Para 2	<p>Jacobs state that it <i>“would question whether expansion of facilities beyond the Green Belt Inset in close proximity to the airport is preferable to a strategically located park and ride scheme, which would limit further impacts to congestion, noise, air quality and visual amenity in the vicinity of the airport and potentially provide a better low cost option which could compete with unauthorised providers. Clearly such provision would dependent on onward transport links, location and local characteristics”</i>.</p> <p>The hierarchy adopted in the Parking Strategy places strategic park and ride sites above sites within the airport site but outside the inset and therefore we would suggest that Jacobs’ statement is incorrect. BAL also questions whether an offsite facility would automatically provide the benefits assumed by Jacobs as this would be entirely dependent on the location of any such facility, the baseline environmental and transport characteristics and distance from the airport.</p>

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3.2.1 Sites within the Green Belt inset	
Para 3	Jacobs recommend that “ <i>all proposed parking facilities within the Inset are fully built out and open to the public prior to the expansion of sites beyond it. This includes all car parks consented through the application for 10mppa</i> ”. For the reasons already set out above, this is not accepted by BAL.
3.2.2 Strategic off-site locations	
Para 1	<p>BAL notes Jacobs’ query regarding the inclusion of sites with a capacity of less than 900 spaces in the shortlisted sites identified in the Parking Strategy.</p> <p>The list of sites for inclusion in the Parking Strategy was agreed with NSC officers. The initial longlist sifting process adopted in the Parking Strategy generally discounted potential sites under 0.25 hectares (equivalent to under circa 150 spaces), unless there were favouring factors to justify further analysis. A site with capacity for 400-500 car parking spaces is considered the minimum number for a viable park and ride scheme (as per White, 2009 in Park & Ride – Implications for TRICS Users, June 2009). From the shortlist of 12 sites, one site under 0.25 hectares was considered due to its favourable proximity to Bristol Airport, although this was subsequently discounted.</p>
Para 3	<p>BAL does not agree that the assessment contained in the Parking Strategy is “<i>overly simplistic</i>” and that an “<i>in-depth assessment</i>” of some of the better performing options should have been undertaken. Nor does BAL agree that cost as a factor has been given too great an influence.</p> <p>BAL considers that the approach to the assessment contained in the Parking Strategy is robust and proportionate. Indeed, an in-depth assessment of the type inferred by Jacobs would be a very large undertaking that would almost certainly not result in any change to the conclusions of the Parking Strategy. BAL would also highlight that since the assessment was undertaken, the Case Officer has sought comments from the relevant local planning authorities in respect of a number of the shortlisted sites. This has not raised any concerns in respect of the findings of the Parking Strategy.</p>
Para 4	BAL does not consider it appropriate for Jacobs to refer to Meads’ comments on BAL’s Parking Strategy.
Para 7	It is noted that Jacobs agrees with BAL that the Mead site is likely to be unattractive to airport passengers.
Para 7	We note Jacobs’ observation that BAL has not suggested how it would operate the Mead site (should it be in a position to do so) and whether this would impact upon the viability of the proposals from a sequential test perspective.

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	As has already been set out in our objection to the Mead planning application, BAL was not approached by Mead Realisations to discuss its current proposal. Notwithstanding this, BAL does not consider that the Mead site is suitable or viable regardless of the operator due to (inter alia) the proposal’s non-compliance with Development Plan policy, insufficient demand and outstanding issues with regards to the environmental and traffic and transport impacts of the proposals which are recognised by Jacobs. BAL has subsequently met with Mead and outlined our views on the viability of the proposal.
Para 8	BAL notes Jacobs’ conclusion that the Mead site <i>“may not offer the benefits of BALs preferred option of an extension to Sliver Zone parking”</i> .
Para 8	With reference to Mead, Jacobs states that it <i>“would be helpful to understand if BAL have similarly considered other sites in the sequential test. Jacobs considers that this type of in-depth analysis should accompany the top performing sites in the table above to ensure that opportunities for such facilities are not overlooked”</i> . BAL would reiterate the points made earlier that it considers the Parking Strategy to be robust and proportionate.
Para 9	BAL notes Jacobs’ suggestion that <i>“the current off-site unauthorised parking sites are included in the assessment”</i> . BAL seriously questions this recommendation on the basis that: <ul style="list-style-type: none"> • The sites considered in the Parking Strategy were identified following engagement with NSC officers. • The sites referred to by Jacobs are themselves largely in the Green Belt. • The sites are currently largely operated without planning consent. • The level of investment required to formalise arrangements would be significant meaning that pricing would not reflect the current position (as noted in Jacobs’ comments). • BAL is unaware of any accurate database held by NSC or others on the number and location of off-site operators such that there is a practical limitation to the recommendation. • The Case Officer has indicated that he is content with the range of sites examined in the Parking Strategy. • The statement contradicts that made by Jacobs later that <i>“it is considered beneficial to reduce the amount of unauthorised off-site parking”</i>.
Para 10	BAL notes and agrees with Jacobs’ comment that <i>“the investment required to formalise arrangements at these [unauthorised] sites via partnering with BAL or run privately by third parties, will likely increase their cost potentially undermining their attractiveness compared with the Airport’s own Silver Parking”</i> .

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3.3 Car Park Phasing	
Para 1	BAL notes that Jacobs accept an approach to car park phasing that includes the year-round use of Cogloop 1 and delivery of Cogloop 2 as an initial phase (aligned with early investment in measures to encourage public transport modal shift) with delivery of MSCP3 restricted until a public transport mode share of 16% is achieved.
Para 4	<p>BAL notes that Jacobs agrees to NSC’s proposal to review parking provision no sooner than 2021 but no later than 2022 and states that <i>“the measure of displaced demand from unauthorised sites will likely play a critical role in assessing parking demand at this stage”</i>. Jacobs also suggest that the review is expanded to consider public transport alternatives <i>“to ensure the needs of all passengers are considered to ensure those displaced from unauthorised sites have alternative options to private car”</i>.</p> <p>As set out above, BAL would agree to a review of the quantum of parking prior to the use of MSCP3. However, it should be noted that in developing the ASAS, full consideration will be given to the provision of transport solutions for all airport users.</p>
3.4 Conclusions	
Para 2	It is BAL’s view that 3,900 spaces should be consented. Provisionally, however, BAL would agree to a review of this quantum of parking prior to the use of MSCP3. This review would be secured via a planning condition.
Para 3	<p>Jacobs state <i>“Although it is considered beneficial to reduce the amount of unauthorised off-site parking, Jacobs considers it unlikely that demand for unauthorised off-site parking would be completely eradicated. It remains likely that operators will continue to undercut BALs parking offer on price, without a thorough review of the airports charging policies”</i>.</p> <p>As highlighted above, research undertaken by BAL indicates that, whilst price is an important consideration, other factors such as convenience, safety and security are also important to a passenger’s choice of parking product. In any case, BAL already operates a pricing strategy which is responsive to levels of demand and complements its ASAS.</p>
Para 4	<p>Jacobs state <i>“It is also important to assess, should unauthorised private operators be forced out, whether BAL dominance over airport parking facilities is likely to result in reduced value for money for airport passengers”</i>.</p> <p>BAL does not consider that impacts on ‘value for money’ are a material planning consideration. Further, this statement would appear to contradict that made by Jacobs earlier in its response that <i>“Although it is considered beneficial to reduce</i></p>

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	<i>the amount of unauthorised off-site parking, Jacobs considers it unlikely that demand for unauthorised off-site parking would be completely eradicated. It remains likely that operators will continue to undercut BALs parking offer on price, without a thorough review of the airports charging policies”.</i>
3. Off-site Parking	
Para 1	<p>BAL notes Jacobs’ comment that unauthorised off site car parks “are responsible for significant congestion, air quality and other environmental impacts in local communities” and that “Any further increased demand due to a lack of official airport parking is predicted to cause a significant increase in on-street parking in residential areas and rural streets as a result”.</p> <p>Research undertaken by BAL indicates that, whilst price is an important consideration, other factors such as convenience, safety and security are also important to a passenger’s choice of parking product. In consequence, increasing the provision of lower cost parking is expected to lessen the demand for unauthorised car parks.</p>
Para 2	<p>Jacobs state that “it is unclear whether BAL dominance over the parking market at the airport would ultimately be the best option for passengers. Furthermore, as noted earlier in this report, where suitable sites exist the CAA propose that airport operators enter accreditation schemes with independent parking operators to offer passengers the required variety of parking services”.</p> <p>BAL has undertaken a review of alternative sites through its Parking Strategy and no suitable sites have been identified, nor have alternative sites been put forward by NSC or other stakeholders.</p>
4.1.1 Indiscriminate Local Parking	
Para 4	<p>Jacobs state that it is important that Parking Summit measures are secured, where appropriate, through planning conditions, the Section 106 agreement or other methods. Jacobs agree that NSC should progress Traffic Regulation Order (TRO) designs and public consultation with funding from BAL.</p> <p>BAL fully recognises the issues caused by inappropriate offsite parking and in response, we have provisionally agreed to provide a contribution towards parking controls including enforcement and TROs.</p>
4.1.2 Proposals by Mead Realisation	

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Para 3	<p>Jacobs state that <i>“BAL could investigate the option of a partnership with Mead Realisations, given that they already own this site and have submitted a planning application. If priced competitively, the site appears to have potential to meet demand from one of the airport new growth regions. The off-site shuttle service nature of the scheme also means it is higher up NSCs proposal modal hierarchy for the ASAS”</i>.</p> <p>This comment contradicts the earlier statement by Jacobs that the Mead proposal <i>“may not offer the benefits of BALs preferred option of an extension to Silver Zone parking”</i> and in any case, Mead Realisations did not contact BAL to discuss their proposals prior to submission of the application. Further, the comment:</p> <ul style="list-style-type: none"> • Does not recognise that the proposal by Mead assumes a pricing structure based on that currently offered at the Silver Zone car park which would clearly not be attractive to passengers. • Ignores BAL’s objection to the Mead planning application which has clearly identified that there would be insufficient demand for a park and ride facility at Junction 21 of the M5. • Misinterprets the modal hierarchy as the primary means of transport to the airport would still be by private car. • Does not recognise that the scheme would shift traffic to other locations. • Does not recognise that there are a number of wider transport and environment issues associated with Mead’s proposals that are as yet unresolved. • That there is considerable uncertainty relating to the deliverability of the scheme.
Para 4	<p>Jacobs state <i>“There may be other opportunities for similar partnerships or accreditation which could be explored at other sites, which could provide alternatives to BAL dominance without resorting to the various unauthorised sites. Their ownership by third party operators would limit the start-up and operational costs to BAL”</i>.</p> <p>BAL has undertaken a review of alternative sites through its Parking Strategy and no suitable, authorised sites have been identified.</p>
4. Drop Off	
Para 3	As recommended by Jacobs, BAL agrees that the ASAS should include a sustainable mode hierarchy.
Paras 4 to 6	BAL fully recognises the impacts that vehicles waiting offsite can have on local highways and communities. To help alleviate this issue, BAL has already opened a free taxi waiting and drop-off car park and we have provisionally committed to maintaining this facility and reviewing its operation as part of the Heads of Terms that accompanies this response.

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	As per Jacobs’ recommendation, a study of drop off and pick up will additionally be completed post-consent. This will form a component of the multi-modal pricing review that BAL has provisionally agreed to prepare post-consent.
5. Car Parking Charging Strategy	
Para 1	<p>Jacobs state that <i>“The Parking Demand and Strategy documents submitted by BAL as part of the planning application do not sufficiently consider the charging strategy for the airport and whether this could be used to minimise problematic unauthorised parking and ultimately reduce driving and parking at the airport as a modal choice, as required by the NSC modal hierarchy. The work to date indicates that price point is the main driver encouraging the use of unauthorised parking facilities and as such is a critical factor in determining future car park use. Given that BAL predict that a significant portion of passenger growth will come from those in the lower quartile of household incomes, and who are more price sensitive, the overall transport charging strategy will likely be a critical factor in determining mode choice”</i>.</p> <p>As highlighted above, research undertaken by BAL indicates that, whilst price is an important consideration, other factors such as convenience, safety and security are also important to a passenger’s choice of parking product. In any case, BAL already operates a pricing strategy which is responsive to levels of demand and complements its ASAS. It should also be noted that BAL does not control or have influence over all charging such as off-site parking, taxis and the majority of public transport services. In consequence, our ability to develop and implement a holistic charging review is significantly restricted.</p>
Paras 3 to 6	BAL agrees to undertake a review of car park charging (post-consent).
Para 3	<p>BAL agrees with Jacobs that <i>“further work should be undertaken by BAL and NSC to better address the unauthorised parking in the vicinity of the airport site which undercuts BALs own locations on price. We note that both parties have responsibilities to ensure that these facilities are used properly, formalised and monitored, operate as formal businesses and do not undercut official parking in an unsustainable manner. NSC should act to ensure the unauthorised parking sites have planning permission for their facilities, operate as authorised business, paying appropriate taxes and business rates, and are able to offer users the amenities they expect of such places. Authorised operations will likely find it harder to compete with the airport on price due to having to pay relevant taxes and business rates, potentially making them less attractive to airport passengers. If the unauthorised facilities refuse or be unable to meet the NSC requirements then enforcement action should be taken...”</i>. Local planning authority enforcement has a critical role to support the ASAS and reduce transport and</p>

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	amenity impacts associated with unauthorised parking. In this context, and as noted by Jacobs, BAL has proposed to fund an officer to undertake this work through the Section 106 (see the Heads of Terms that accompanies this response).
6. EV and Low Emissions Vehicles	
Paras 1 to 2	<p>Jacobs state <i>“It is unclear whether any demand assessment has been completed to establish whether this provision will meet the current or growth need for such provision...A review of the proportions of the national fleet should be undertaken prior to the detailed design of each proposed car park extension at the airport to ensure suitable provision. This is particularly critical at car parks which offer block parking due to the need to regularly move vehicles”</i>. BAL also notes that Jacobs <i>“would expect to see further information on the airport’s strategy to facilitate and promote the use of these [EV] vehicles as required by the NSC modal hierarchy in additional work going forwards. This should include an assessment of potential demand to ensure proper consideration is given to this key future mode.”</i></p> <p>BAL has provisionally agreed to develop an Ultra-Low Emissions Strategy (post-consent). This will inform an implementation plan for accelerating the introduction of lower-emissions vehicles into fleet and confirming EV charging points and infrastructure.</p>
7. Monitoring Strategy	
General	BAL’s comments on the proposed monitoring strategy are contained in our response to the ‘NSC Transport and Highways Summary Comments’ above.
Para 4	BAL notes Jacobs’ recommendations for monitoring related to car parking and the proposed conditions in this regard; however, we do not consider that Jacobs’ proposals would be necessary or practical to implement. In particular, we question the proposed condition <i>“Should the parking occupancy exceed 95% (or a number to be agreed with BAL) for a complete 7-day period then a review of the surface access /travel plan, including a programme for the implementation of any necessary measures identified within the review should be submitted to the local planning authority for approval within 4 months of the survey. This should prioritise investment and implementation of measures contained within the surface access/travel plan to encourage travel by public transport, thus minimising use of the car park, prior to the release of any additional parking space for airport use”</i> . Indeed, the reference to 95% occupancy is contrary to Government policy which promotes the making the best use of existing airport capacity.

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	Instead, BAL proposes that monitoring is undertaken in the future as part of the proposed monitoring programme that would inform the Highway Improvement Fund, as proposed within the ASAS measures. Mode share assessment would be undertaken through review of the comprehensive CAA surveys at Bristol Airport, to be planned and managed through agreement between NSC and BAL.
Para 5	As noted above, BAL does not consider it appropriate for Jacobs’ comments to refer to growth beyond 12mppa as this is not a material planning consideration.
8. Staff Parking	
Para 1	Jacobs state that it is unclear whether the proposed mode share target of at least 30% staff using non-single occupancy vehicle (SOV) car travel applies to all staff or only those employed by BAL itself. To confirm, the target would apply to all staff.
Para 1	BAL notes that Jacobs agrees that the 30% target proposed by BAL is appropriate.
Para 2	Jacobs state that <i>“further work needs to be carried out to ensure that modal shift to more sustainable forms of transport is also achieved amongst all employees travelling to and from the airport daily. This should be included in the ASAS and associated Staff Travel Plan and cover all staff with BAL security accreditation to work on site”</i> . BAL agrees with this recommendation and further detail will be included in the ASAS and Staff Travel Plan.
9. Conclusions	
General	Where there are additional comments in this section that have not already been considered, a response has been provided below.
Para 1	BAL notes that Jacobs agree that the demand forecasts for the airport are robust.
Para 2	BAL disagrees with the statement that <i>“BAL’s Parking Strategy...appears skewed to demonstrate that the airport’s preferred parking solution is the only viable option”</i> . We consider that the Parking Strategy is robust and credible and clearly supports BAL’s preferred parking solution. Further, as noted by Jacobs, NSC officers have accepted the assessment.
Para 3	Jacobs state <i>“It would appear Bristol airport it at a tipping points in terms of mppa at which significant investment in PT is required to ensure sustainable travel and thus reduce the future parking demand”</i> .

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	<p>This statement is based on a surprisingly basic benchmarking exercise undertaken by Jacobs. As outlined above, it is misleading to benchmark BAL’s parking proposals and public transport modal share with other UK airports. Further, this statement is not supported by evidence and does not reflect the investment in sustainable travel proposed by BAL as part of its proposals for growth to 12mppa which we consider is significant.</p>
Para 4	<p>Jacobs state that <i>“Given the airport’s plans to continue expansion, Jacobs would suggest investment now in longer term sustainable options with parking provided only for trips that cannot be moved to sustainable modes. These should include well-sited off-site car parks with shuttle services and more robust PT accessibility to the airport, as opposed to solely focusing on the extension of existing onsite facilities within the Green Belt, causing increased congestion on unsuitable roads in the vicinity of the airport.”</i></p> <p>BAL maintains that it is inappropriate for Jacobs to refer to growth beyond 12mppa which is outside the scope of the current planning application. Further, BAL would question whether there is evidence to suggest that extensions to existing onsite facilities would result in increased congestion relative to off-site car parks.</p>
Para 5	<p>Jacobs state that the Mead Realisations proposal <i>“highlights the potential for the airport to work with third party operators who already own land, which could reduce the burden of risk and cost on BAL whilst providing more sustainable solutions for future growth, focusing on the catchment areas which will deliver growth as identified by BAL”</i>. Jacobs also state that <i>“Whilst we note the importance of reducing passenger’s reliance on unauthorised off-site providers, official P&R schemes have the potential to deliver low cost parking solutions which can compete on price with the unauthorised providers, where the pricing of the airports own on-site parking may not”</i>.</p> <p>This comment appears to contradict the earlier statement by Jacobs that the Mead proposal <i>“may not offer the benefits of BALs preferred option of an extension to Sliver Zone parking”</i> and in any case, Mead Realisations did not contact BAL to discuss their proposals prior to submission of the application.</p> <p>BAL has undertaken a review of alternative sites through its Parking Strategy and no suitable sites have been identified.</p>
Para 6	<p>Jacobs state that NSC has commented that many of the public transport improvements to facilitate the 15% public transport modal share at 10mppa have already been delivered and it is therefore unacceptable to expect these</p>

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	<p>improvements to be sufficient for future development to 12mppa without further investment. Jacobs contend that it would be sensible to invest now to increase modal share to achieve a stretch target of 17.5% for public transport (as proposed by NSC) and ensure that future airport growth is more sustainable.</p> <p>Achieving a public transport modal share target of 15% at 12mppa would not preclude further investment in public transport over and above that committed to as part of the extant consent for growth to 10mppa; indeed, 15% public transport modal share at 12mppa would clearly mean a higher number of passengers using public transport (relative to 15% at 10mppa) and in this context, BAL had proposed a number of public transport improvements in its Heads of Terms submitted with the planning application. Further, the Transport Assessment has demonstrated that a public transport mode share of 15% at 12mppa would result in an acceptable development in planning terms. Notwithstanding this, BAL has provisionally agreed to a stretching 17.5% target with significant early investment in public transport.</p>
Para 6	<p>Jacobs suggest that money from any permitted car parking expansion onsite could be used to subsidise better bus services and investment in park and ride facilities.</p> <p>BAL strongly disagrees with this suggestion. BAL has provisionally agreed to a stretching 17.5% public transport modal share target and associated significant and early investment in public transport. BAL would add that it would be wholly inappropriate for NSC to control income generated from car parking and that it is for the ASAS, developed with the Airport Transport Forum) to set out where investment is required (in accordance with Government policy). Airports operate in a highly competitive environment across all facets of their business. At Bristol Airport, income from areas such as parking allows BAL to keep charges to airlines low, benefiting travellers through lower air fares and increased connectivity. It also supports the ongoing investment in facilities necessary to maintain a modern, efficient airport.</p>
Para 7	<p>Jacobs state that a study may be required to determine which proposals offer the most opportunity for modal shift.</p> <p>BAL does not consider that such a study is necessary in the context of the measures set out in the Heads of Terms submitted alongside this response and the proposals for monitoring already outlined above. We would also highlight that it is the purpose of the ASAS, developed in liaison with the Airport Transport Forum, to identify the most appropriate sustainable transport measures. This is in accordance with Government policy.</p>

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Para 8	<p>Jacobs state that <i>“Given the likely demand for low cost provision the release of parking spaces should prioritise the year round use of the existing Silver Zone extension (Cogloop 1) Silver Zone extension in the first instance followed by the expansion of Silver Zone known as Cogloop 2. However, the need for both these expansions are predicated on all parking facilities consented at 10mppa being open to the public. Should this not be the case then a shortfall beyond the spaces provided at the Silver Zone sites will exist. Therefore, Jacobs suggest that NSC require all parking consented at 10 mppa is open to the public prior to the opening of any additional facilities consented under the 12 mppa application”</i>.</p> <p>Whilst BAL agrees with Jacobs’ comments relating to the broad phasing of car parking proposed under the 12mppa planning application, we strongly disagree that the parking consented under 10mppa but not yet implemented (i.e. MSCP2) should be brought forward first. BAL remains committed to the delivery of MSCP2 and will bring forward the car park when there is sufficient demand to make such a significant investment commercially viable; the timing of the delivery of such a significant investment is, and should remain, a business decision. In any case, the Silver Zone extensions are required regardless of whether MSCP2 is delivered because of the demand for low-cost parking. A failure to meet this demand will result in the increased use, and impact, of unauthorised car parks.</p> <p>Importantly, this statement is not in accordance with the phasing set out in NSC’s comment which identifies the immediate full year release of the Silver Zone extension (Phase 1) and delivery of the Silver Zone extension (Phase 2), alongside early investment in public transport as a first phase.</p>

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APPENDIX 4: Highway Engineering Comments (dated October 2019)
Internal Memorandum from D&E: Highways & Transport
BAL are happy to agree in principle to all of the comments raised and will address each of these comments at the detailed design stage to agree the final scheme.