Parish Councils Airport Association comment on Bristol Airport's response to application 19/P/0704/FUL

(Land East of Junction 21 Of M5 Haybow Hewish - Change of use of land from agricultural use to allow the construction of access roads, reception centre, a Park and Ride car park for Bristol Airport parking allowing for up to 3,000 cars to park)

The PCAA read with great interest the response by Bristol Airport objecting to planning application 19/P/0704/FUL for a Park and Ride car park for Bristol Airport for up to 3,000 cars. The PCAA have the following comments.

This response is also to be submitted to the Bristol Airport application 18/P/5118/OUT as further evidence that we wish North Somerset Council to examine this site as an alternative to extending the Silver Zone car park further into green belt land for 2,700 cars. The PCAA do not believe that Bristol Airport has yet shown the 'very special circumstances' to justify further car parking on green belt land.

It is more than obvious that the preference for Bristol Airport would be to retain all car parking on land within their ownership. As the PCAA have stated numerous times, Bristol Airport has a near monopoly on car parking and their business model is heavily dependent on car parking revenue. One third of their revenue comes from car parking. The airport's objections are therefore biased and show a conflict of interest.

The PCAA has objected to the airport application 18/P/5118/OUT in the strongest terms. The PCAA note, however, that the airport application has failed to develop a set of principles on how they will approach the provision of access to their facilities that reflects competition and consumer law as advised by the Civil Aviation Authority. (Reference: http://publicapps.caa.co.uk/docs/33/Advisory%20letter%20DEC16.pdf)

The airport response to**19/P/0704/FUL** has given the following reasons for objection:

- Impacts on emerging Airport Surface Access Strategy
- Impact on sustainable transport choices for passengers
- Increased use of unauthorised car parks off site
- Deliverability
- Ecology

Impacts on emerging Airport Surface Access Strategy

The PCAA cannot see how this application will adversely impact on the Airport Surface Access Strategy but only enhance it by giving passengers an earlier point in their journey to access a bus to the airport. Through conditions on the Mead application, improvements can be made to the highways and it may reduce unauthorised use of offsite car parks. The Airport Surface Access Strategy should be maintained as planned to resolve transport issues under growth to 10 mppa even if the airport application is refused.

Impact on Sustainable transport choices for passengers

The airport states that the application will undermine their desire to increase the public transport proportion of passenger journeys to 15% at 12 mppa without explaining their rationale. The PCAA have to remind North Somerset Council that this target was set to be achieved at 10 mppa. It is currently 12.5% and not expected to reach 15% at 2021, when the airport predicts 10 mppa. No penalties have been placed on the airport for not achieving this target. The Mead application can only enhance passengers using a bus service and taking cars off the A370. It certainly should not be used as an excuse for the airport's failure to meet their targets.

The PCAA cannot see how it would undermine the Weston Flyer and the Stagecoach Falcon as these passengers have opted to take public transport rather than pay for car parking.

Increased use of unauthorised car parks off site

Bristol Airport states that 'it would also lead to the increased use of unauthorised car parks with associated impacts on the Green Belt'. The PCAA find this statement totally unrealistic. It is not evidence-based but an unfounded assumption. The suggested pricing in the Mead Scheme appears to be similar to that of the airport.

Deliverability

The PCAA would expect North Somerset Council to apply conditions on the availability and deliverability of the car parking spaces to match passenger growth. This would take away the risk of delay and the propensity for passengers to use unauthorised car parks. The PCAA would like North Somerset Council to note that Bristol Airport has not phased or delivered Multi Storey Car Parks as granted under the planning consent of 2011. The five storey MSCP 1 was expected to be constructed and in use for 8 mppa not approaching 9 mppa. MSCP 2 expected for 9 mppa is still to be constructed as is the public transport interchange, part of growth to 10 mppa. It is ironic and inappropriate that the Airport should include comments about deliverability of car parking spaces when their own record is so poor.

Ecology

Both the Mead and the Bristol Airport car parking applications are within the North Somerset and Mendip Bats Special Area of Conservation (SAC). The Mead application is within 5 km of a SAC and Bristol Airport less than 2 km from a SAC. A bat survey should be commissioned by Mead Realisation and a survey should be commissioned by the airport on the 8 ha of woodland to provide replacement habitat relating to their proposed expansion. The PCAA fully support the recommendations by the Natural Environment officer on the Mead application and would expect these to be conditioned if

granted consent. The PCAA question how the purchase of existing woodland can negate the impacts of loss of foraging for the bats at the airport.

The NSC officer writes on the Mead application '*I must make it clear here that turning a piece of open countryside into a large car park with security lighting is a damaging proposal in wildlife terms and my objection may remain after surveys are complete if the ecological provision provided in the proposal does not change substantially.'* The PCAA note that no such words have been written in relation to the open, greenbelt land at the airport which is situated even closer to a SAC. If the Mead application is turned down on environmental reasons so should the Bristol Airport application.