

	Respondent	Comment
1.	Resident	The Council allow the building of houses everywhere despite public objections so why not let people park by the airport in temporary car parks! Why allow what people don't want and disallow what people do want!!!!
2.	Resident	Thank you for the update on the issues of Airport parking. I fully support the actions of north Somerset council regarding miss-use of greenbelt open spaces near to the Airport.
3.	Resident	I agree that the problem is out of hand and that access too many of the sites causes a safety hazard.  I support the restriction but suggest that a limited number of sites be licensed.  Bristol Airport parking charges are extortionate. Either they must be capped at a lower level or the Airport should be very heavily taxed and the extra revenue spent on improving local transport infrastructure including public transport instead of running it down as in the case of the A2 bus!
4.	Resident	As a customer of the airport and with no other interest in the matter, I object to the proposal on the grounds that it would give an effective parking monopoly to the Airport. Only competition from local, off-site providers helps to regulate the charges imposed by Airport Parking.
5.	Resident	Whilst I would support efforts to restrict off airport parking in green belt areas the problem persists because of the exorbitant charges imposed by Bristol Airport for ON airport parking. There used to be free drop off and pick up parking at Bristol as at many others but not anymore. This makes it particularly difficult when friends/relatives travelling from some distance away and meeting passengers who whilst they may have accurate information about when a flight is landing but not how long it will take to clear customs and baggage reclaim both of which, from my own experience, can vary greatly. I suspect Bristol Airport makes more money from car parking charges than it does from landing fees. So perhaps before you rush to boost their income from this source even more they should be encouraged to improve their onsite provision and charges.
6.	Resident	Regarding the above, you should not restrict parking by introducing an article 4 direction around the site.  The Council has allowed the airport to be expanded which has increased the volume of users. This should have been a consideration when allowing the airport to be extended not an afterthought because now there are problems with excessive parking around the area.  There is an NSC SPD for parking policy - this should have been updated before allowing further extensions to the airport.  In the current climate, you can get flights to a European country for less than £100 return but by restricting parking around the area, it will cost more to park your car for a few days on site at the airport than to fly literally hundreds and thousands of miles ridiculous.  You don't as they say make an omelette without cracking eggs.
7.	Resident	I disagree with this proposal as it is nothing more than a thinly veiled attempt to allow Bristol Airport to benefit from all parking fees and to prevent entrepreneurial individuals from operating legitimate businesses.

		<p>No-one suffers as there is little housing in the immediate area of the airport where most of these car parks are based. I drive through the area every day and there is no more issue from these car parks as there is from the volume of traffic on the A38 anyway.</p> <p>You are preventing users of the airport of having a choice of where to park and how much to pay.</p>
8.	Resident	<p>This is definitely an area which has to be tackled, and I'm sure the proposed action is going to be the only way forward, given the ingenuity of unofficial operators. It's no good having these field and pub car parks everywhere.</p> <p>Of course what pushes people in their direction is the airport's policy of having expensive car parking itself. Unfortunately this means that the Article 4 move will undoubtedly financially benefit the airport owners, driving more travellers to use the airport's expensive car parks. I would therefore like to see the airport being positively involved with this proposal, by reducing its prices. Little chance, I expect!</p> <p>In the long run, we all want the airport to continue its success, which benefits the whole community, and I believe the Article 4 Direction will make airport use with vehicles a better experience - apart from the prices.</p> <p>Tackle it we must, so I support the proposal.</p>
9.	Resident	<p>You state that many individuals are ignoring permitted development legislation (28-day rule) in order to provide off site Airport parking. I believe that such transgressions should as a matter of course be pursued through the courts as surely repeated offences should lead to increased fines.</p> <p>However, I believe one must look at the cause of such transgressions and that is simply the excessive costs of on-site parking. Any support by NS (outside of existing legislation) to prevent this will be seen as mandating customers to use on-site parking and will do little to increase the perception of NS as a Council. People will believe NS gets considerable revenue from the airport and you are simply looking after a major customer.</p> <p>I see absolutely no reason why a park and ride type scheme e.g. Long Ashton P and Ride could not be used to generate Council revenue once of course Bristol has sorted out the existing agreement. A bus current operates to Southmead Hospital why not the airport?</p> <p>NS should be thinking how we can direct some this "unlawful revenue" into Council coffers rather than spending money pursuing people who will continue to ignore the law until such time as it becomes financially unviable.</p> <p>So policy should be</p> <ol style="list-style-type: none"> <li>a) pursue existing offenders</li> <li>b) consider off site alternatives</li> </ol>
10.	Resident	<p>I wonder whether you have done any research into how many cars are parked on offsite car parks and whether they would all fit into the Bristol airport car park. I feel that there might be a demand for a park and ride near the airport. AS a Resident in Compton Martin, I would really appreciate the provision of a cheap, regular bus service into Bristol from the airport, which would reduce congestion in Bristol and CO2 emissions. This could be an extension of the existing airport bus facilities.</p>
11.	Resident	<p>The plan to restrict off-site parking at Bristol Airport has nothing to do with the welfare of the nearby community but all about money. There is a great need for both off airport parking and overnight accommodation. To deliberately restrict competition is unfair to those who are attempting to scratch a living in this feeble economic climate. Should you implement this ill-conceived plan you are, once again, taking away the public's right to obtain value for money. You will give the airport a monopoly over parking and accommodation which will enable them to extort even more cash from their customers. Bristol airport is one of the few airport in the UK who have no free drop</p>

		<p>off or pick up parking zones which may give a good insight to the future costs that they will impose. You have allowed BIA to expand rapidly and in doing so you must take into account the needs of passengers arriving and departing. Should you use this draconian plan you will also be throwing men and women out of work and into job centres. Where do you expect them to get work? At the airport perhaps? By all means inspect and licence them (within financial reason) and use that to close down the cowboys but please dismiss this plan.</p>
12.	Resident	<p>If the owners of Bristol Airport did not charge rip-off prices, there would be little requirement for any other parking.</p> <p>The same for the outrageous pick up charges and taxi service generally.</p> <p>It is the greedy airport owners that need to be regulated!</p>
13.	Resident	<p>I would like to offer responses to the Councils intentions to restrict off-site car parking at Bristol Airport.</p> <p>It is essential to have quick and easy parking facilities to the airport for Passengers making flights. To make this attractive and efficient, you must have fair competition, not exclusive parking by the Airport Authority alone.</p> <p>But I fully agree that we should restrict the growing use of pasture and countryside for parking, both for the environment and the local population.</p> <p>My suggestion would be to have some of the land already within the current airport boundaries, of which there is a considerable amount, allocated for external businesses to provide competitive parking.</p>
14.	Resident	<p>I do feel that we want the ever expanding airport to continue to provide us with great connections in and outside UK. The parking choices are limited, very busy, and expensive, public transport connections leave much to be desired so people will always seek other options.</p> <p>In my experience having tried a couple of the smaller and cheaper sites they were quite discreet, So well hidden that in fact quite hard to find, and I could not see them causing any problem for their remote neighbours.</p> <p>There may be others that do cause a problem so I would suggest a case by case approach, bearing in mind that many 'farmers' really need any small extra revenue stream they can find.</p> <p>Strategic local planning should include space for more off-airport car parks, preferably to cover as many points of the compass as possible and to be served by reliable shuttle services. This approach should aim to reduce congestion close to the airport and on the local main roads. The A 38 is busy enough in its own right with much extra load generated by airline passengers</p> <p>At London Gatwick, of course a larger site, there are many car parks (and hotel and B&amp;B overnight accommodations) in the surrounding areas. They do enjoy a more comprehensive road system. Some of the sites share transfers and some use secondary parking locations, i.e. your vehicle is stored elsewhere after you have left it then delivered to you on return. "Park and Fly ", "Meet and Greet", There are many permutations of solution!</p>
15.	Resident	<p>As a Resident of North Somerset, I strongly object to the proposal to make an Article 4 Direction in this case.</p>

		<p>We have to put up with the airport in a number of ways; noise, nuisance, traffic etc. The airport is foreign owned and the most unwelcoming. It is a particularly greedy organisation that over charges for any parking, short or long stay. I do not understand why our council is effectively giving the airport which is a Limited Company a financial advantage and allowing them to corner the market. .It will only lead to ever increasing charges and more people queuing by the side of the road who are not prepared to be over charged for even short stay/dropping off.</p> <p>I emphasise that I have no financial interest in car parking but do not see why ordinary North Somerset Residents should not gain some benefit when they have to put up with all the disruption of an airport. The airport already has several unfair advantages such as the planning benefits on site etc.</p> <p>I am therefore strongly opposed to this proposal.</p>
16.	Resident	I would be in favour of North Somerset Council making an Article 4 Direction which would remove the automatic “permitted development” rights for storing, parking, cleaning, maintenance or repair of any motor vehicle within a certain area around the airport.
17.	Resident	<p>I’ve witness the springing up of ad-hoc car parks over the years and they are most definitely an eyesore and a blight to the Countryside.</p> <p>I’d support the Council.</p> <p>That said one of the issues is that the airport charges are too high – more should to make the Airport more affordable and to seek a financial contribution to policing the issues like off-site parking that have arisen.</p>
18.	Resident	<p>The effect of such a directive will create a monopoly for the owners of Bristol Airport and its sole Taxi company.</p> <p>Having waited 30 minutes for a taxi and charged £13 to go to Wrington from Bristol Airport I shudder to think how much the fares and airport car parking fees will increase by.</p>
19.	Resident	I assume the council have a vested interest in only allowing the airport to park cars.I can see no harm in allowing other people to make some money from parking cars.
20.	Resident	I believe the Council have an overriding duty to airport users to mitigate the stranglehold the airport owners have in parking provision for the airport. The onsite car parking prices amount to the operator abusing a virtual monopoly. For NSC not to foster competitive provision is aiding and abetting an abuse of a dominant position by the Airport operators. Further such action by NSC has the effect of limiting local businesses from benefitting in one of the few opportunities open to them in the area. For the council to stand on the side of a foreign operator against local businesses is inexcusable.
21.	Resident	What you propose sounds a good idea. In addition I think you should strongly insist that instead of taking up acres of beautiful countryside the Airport should be made to have UNDERGROUND multi storey parking. They make millions of pounds and with so many parking fees the out of sight parking should pay for itself in no time. No more new above ground parking please.
22.	Resident	It seems to me that the efforts to restrict off-airport parking may have more to do with conspiring to preserve the airport monopoly than with any harm that these operations may cause. I find it implausible that they are all causing either danger or inconvenience to others.
23.	Resident	Shocking behaviour by the Council. But to be expected. And presumably some sort of kick back from Bristol Airport.
24.	Resident	As a regular user of the roads around the Airport I welcome your decision to act to stop the proliferation of unauthorised car parking outside the Airport.

		<p>At last you have decided to act, not before time I would say. In particular I would highlight the dangers to the public caused by vehicle exiting onto the busy A38 from various unauthorised car parking establishments that have sprung up in recent years between the Airport roundabout and the well-engineered quarry entrance further towards Bristol. Hopefully in the near future these can be closed down.</p> <p>Clearly I fully support your Decision 16/17 DE162</p>
25.	Butcombe Parish Council	<p>I am emailing on behalf of Butcombe Parish Council, who discussed the proposal on Tuesday evening.</p> <p>We are very much in favour of such action, which is long overdue, but I just wanted to query the dates at the bottom of the notice – it says the Direction will come into force on 1<sup>st</sup> Jan 2017, but not be “enforced against” until January 2018. Is that correct, and if so why such a long delay?</p> <p>I imagine the perpetrators will redouble their efforts to make as much money as possible next year, and the impact (including danger) on unsuitable roads will be even greater than now.</p> <p>We will let you have a full response in the near future, but I would appreciate clarification first.</p>
26.	Wessex Water	<p>Wessex Water provide sewerage services in the area proposed. In maintaining our assets we both construct new infrastructure and undertake repair and maintenance on existing assets. This can require the temporary use of land for construction compounds. Such use includes parking (of machinery and workers cars) and movable structures (cabins to provide welfare facilities for site teams and storage). At present we establish compounds using Permitted Development Rights conferred by the GPDO 2015 Part 4 A (when compounds are adjoining) and Part 4 B (when compounds are remote but are required for short periods of time only).</p> <p>The construction compounds we establish are temporary to support essential works and once improvements have been delivered we remove structures and vehicles from the land.</p> <p>We are concerned that the proposal consulted on will require us to obtain express planning consent for the establishment of temporary compounds. We understand that this is not the motivation behind the proposed Article 4 Direction which is to prevent unauthorised car parking sites. The requirement to obtain express planning consent for temporary compounds will add an unnecessary administrative burden. It will also hinder our ability to undertake reactive work which is required to address operational incidents such as leaks and blockages. In dealing with operational incidents our site teams are required to mobilise quickly and these requirements are not compatible with the timescales for obtaining express planning consent.</p> <p>We therefore request that the Article 4 Direction includes an exemption for construction compounds required by Statutory Undertakers.</p>
27.	Cllr R Nightingale	<p>It's important that a proposed change to off-site airport parking, does not allow any current provider a monopoly on such business in the future. If this does prove to be the case, I believe it will reflect poorly on North Somerset Council in years to come and be anti-competitive and business restrictive to others, in what is a very lucrative market.</p>
28.	Resident	<p>I would like to point out that if the airport controls all the parking in the area then there is no competition so they can charge what they like. The only reason people go to unauthorised parking areas is because they are considerably cheaper. I suggest maybe other sites could be identified and given planning permission to be run by other operators to keep parking prices competitive.</p>
29.	Resident	<p>There are some difficulties with the draft map accompanying the Article 4 Direction consultation (copy attached). Presumably the area that is proposed to be covered is shown by the red line which is defined by the A370 to the west and the district boundary to the north and east. However, the map key does not identify this line.</p>

		<p>There is also a problem with way the Green Belt is shown beyond the district boundary in Bath &amp; NE Somerset, which appears to follow a strange area of green shading on the North Somerset planning constraints map, with straight lines converging west of Temple Cloud. The Green Belt boundary in B&amp;NES is quite different, passing north of Bishop Sutton.</p> <p>The southern boundary of the proposed Article 4 Direction is also strange: following Wrington Road from north of Congresbury to the A38) and then natural features further east (the Congresbury Yeo west of Blagdon). Given the purposes of the Article 4 Direction, there should be a clear rationale for the proposed area: probably based on driving times from the airport. Without a clear rationale for the proposed area that is related to the purposes of the Direction it will be open to challenge.</p> <p>Burrington Parish Council will be responding to this consultation and is likely to call for the Parish of Burrington to be included in the area of the Direction as there is already clear evidence of the risks of unauthorised airport parking in the parish. In this case, a 10-minute drive time from the airport roundabout would provide a convenient rationale, to include the former garden centre site in Burrington Combe. A 10-minute drive time would also extend to Churchill Gate (A38/A368) and nearly to Blagdon. However, there is a very good case for extending the southern boundary of the proposed Direction to the district boundary, which would be still be only 11 minutes' driving time from the airport roundabout along the A38 near Doleberrow, or 13 minutes via A38 and A368 to the boundary east of Blagdon</p> <p>Please take this email as a personal representation on the proposed Article 4 Direction which I strongly support, but which needs to be strengthened by being related to an area with a clear rationale, as described above.</p> <p>If possible, it would also be helpful if you could provide clarifications about the published map, including the key and the Green Belt notation.</p>
30.	Resident	<p>I would agree with the principle of a more robust and streamlined approach. However there is a danger that a defined boundary restricted to Greenbelt, unless suitably extensive, will only drive the problem to the periphery and in fact may encourage opportunistic ventures outside this area. For example, the proposed boundary would not include Rectory Farm in Yatton where a problem occurred last year with airport parking of over 50 cars in a field adjacent to the Strawberry Line. A bit like fly tipping the problem will not go away overnight unless there is a comprehensive policy to tackle the problem throughout North Somerset. Would it be possible to extend the proposed boundary beyond the Greenbelt?</p>
31.	Resident	<p>I am glad at last that some more effective enforcement around this obvious abuse is being planned. Cars pulling out from small tracks on to the main a38 is very dangerous. I know personally that other criminality is fed by funds from some of this parking.</p> <p>What I don't understand is the year it will take. I know legally that abusers need a 'warning', but why should this be for a whole year. They set up within two weeks!</p> <p>A positive step anyway.</p>
32.	Highways England	<p>Thank you for consulting Highways England on North Somerset Council's plan to restrict car parking in a defined area by way of an Article 4 Direction. We have reviewed the supporting documents and have determined that the area covered by the proposed Article 4 Direction does not include any of the highway network for which we are responsible.</p> <p>We can confirm that we have no objections to the Direction being made. Further we support the Council's aim to better control car parking for persons using Bristol Airport so that a comprehensive and effective strategy can be developed to maintain and where possible improve the surface access arrangements for the Airport.</p>

33.	Resident	The modern way is to create competition from services and retailers Not to create a monopoly which is exactly what will happen if the council clamp down on temporary Parking. The alternative would be to properly licence suitable sites around the airport so that people can have a choice rather than be fleeced by high charges which the airport authority will know they can get away with charging.																														
34.	Nailsea Town Council	Nailsea Town Council supports North Somerset Council in its intention to apply the planning regulations, and also wants to see the authority encourage the licensing of off-site car parks not owned by the Airport in order to encourage competition.																														
35.	Resident	<p>There is clearly a demand for competitive long stay parking around Bristol Airport which is driving the presence of the several off site private parking companies referred to in this document. As a former PResident of Portishead Chamber of Commerce and regular airport user I am deeply concerned about North Somerset reducing the opportunity for private off-site car park operators to exist. Bristol Airport is already one of the most expensive regional airports to park at and reduction in competition is likely to lead to an escalation of on-site car parking prices. From the survey carried out today for parking from 30th Nov ie booked 28 days ahead please see the prices currently charged by several airports:</p> <table border="1"> <thead> <tr> <th>Duration</th> <th>24hrs</th> <th>7days</th> <th>14days</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>Heathrow T4</td> <td>£26.00</td> <td>£65.40</td> <td>£85.10</td> <td>Long stay</td> </tr> <tr> <td>Gatwick North</td> <td>£17.00</td> <td>£43.00</td> <td>£71.00</td> <td>Long stay</td> </tr> <tr> <td>Cardiff</td> <td>£16.99</td> <td>£34.84</td> <td>£52.69</td> <td>Long stay</td> </tr> <tr> <td>Bristol Long Stay</td> <td>£23.99</td> <td>£50.99</td> <td>£88.99</td> <td>Long Stay</td> </tr> <tr> <td>Bristol Silver</td> <td>n/a</td> <td>£43.99</td> <td>£63.99</td> <td>Silver - non flexible</td> </tr> </tbody> </table> <p>As can be seen Bristol Airport pricing is more comparable to Heathrow/Gatwick airports but with land values at a fraction of the South East this is hard to justify other than based upon the poor competitive situation around Bristol Airport. Please do not exacerbate the current situation by making it harder for off-site airport operators to exist.</p>	Duration	24hrs	7days	14days	Notes	Heathrow T4	£26.00	£65.40	£85.10	Long stay	Gatwick North	£17.00	£43.00	£71.00	Long stay	Cardiff	£16.99	£34.84	£52.69	Long stay	Bristol Long Stay	£23.99	£50.99	£88.99	Long Stay	Bristol Silver	n/a	£43.99	£63.99	Silver - non flexible
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36.	Resident	<p>My concern is the exploitation of the 'permitted development rights'. Additional parking for the airport is a requirement, however it should be authorised and regulated accordingly by the council. This regulation should also include Bristol Airport to ensure what they are charging is not at an inflated price because of their monopoly as an approved parking provider.</p> <p>The proposed restricted area should be drawn to include the parish of Burrington as there is evidence of unauthorised car parking within the parish.</p>																														
37.	Resident	<p>I am a local Resident with no connection to the airport or any off-site parking providers, authorised or otherwise.</p> <p>I am concerned that the effects of the proposed order will be to stifle competition and effectively provide Bristol airport with a monopoly on parking. My understanding is that the airport has already successfully sought to go outside its proposed plan for parking by delaying the provision of multi-storey parking to take the relatively easy option of delivering a 'greenbelt' car park first. It appears the airport themselves recognise the benefit of low cost parking facilities, and are keen to effectively compete with the existing off-site providers.</p>																														

		<p>The airport is clearly an important employer in the area and supports a number of supply-chain businesses and providers, but I am deeply concerned that the proposed approach to being unable to enforce legislation is to effectively ban off-site parking, to the obvious benefit of the airport.</p> <p>The effect of the proposal appears to restrict the provision of off-site parking and remove choice for paying customers.</p> <p>It is not explicit in the proposal, however its tone suggests an intention (whether stated or otherwise) to restrict and remove off-site parking facilities. There is nothing in the consultation that suggests that the planning authority will be open to offsite parking applications that would enable local providers to benefit from their location, once the change has been made.</p> <p>Living in the locality of the ninth busiest airport in the country inevitably has an impact on local Residents. Whilst there has been expansion in recent years, the majority of Residents will have been aware in advance of the airport's existence by the planes landing and taking off! As the majority of the off-site parking operations operate a park and ride approach, where customers park their vehicles and a number are taken to or collected from the airport in a minibus or similar, the reduction in customer vehicles driving onto the airport itself must be a benefit in reducing traffic issues locally. Indeed the provision of multiple offsite parking providers can be argued to benefit the local transport infrastructure and Residents' lives.</p> <p>I would not support this proposal without the introduction of a policy or approach that actively looks to license offsite providers. The government has a stated aim to support SME's, but the effect of the proposal in its current format will be to stifle the small-scale service providers in favour of the airport company. During recent years as the airport expanded it was often reported in the media that the expansion would be positive for the local economy. If this was anything more than a simple PR statement, NSC should consider how that economic benefit might now be retained locally rather than handed to the airport's shareholders/owners.</p>
38.	Resident	We agree wholeheartedly that there should be a restriction of off-site parking for Bristol Airport, as property owners in West Town, Backwell, North Somerset.
39.	Resident	<p>I'm very surprised no background information has been given by North Somerset Council on this consultation.</p> <p>I'm in favour of using Article 4 in order that the Green Belt is protected if Article 4 includes Bristol Airport. Bristol Airport recently under permitted development regulations submitted a planning application 16/P/0454/PAI for 200 cars on Green Belt land outside the planning consent of application 09/1020/OT2. North Somerset Council granted permission. Bristol Airport has also failed to build a multi-storey car park for 7.3 mppa which was subject to a condition under the 106 Agreement. Bristol Airport's business model is in part dependent on revenue from car parking.</p> <p>The car parking issue at Bristol Airport and outside the Airport needs to be resolved fairly. North Somerset Council should make a call for sites suitable for car parking and write a supplementary planning document which we can all give detailed opinions.</p>
40.	Resident	The council is enforcing the legal rights of a monopoly car parking provider in the green belt in the form of Bristol Airport. This is to the detriment of the public using the airport, who pay very high car parking charges and the local population who contend with dramatically increased airport volumes and the resultant increase in traffic congestion and noise pollution.
41.	Resident	By restricting outside parking around the airport you are giving them a clear monopoly to charge as much as they like, as they are already doing with vehicles visiting to drop off or pick up, the only place they can legally stop is in an area where they must pay to leave. If they have total control of parking, prices will be raised at will, and travellers will have little choice but be ripped off. Why not set up licenced parking areas around the airport, (that is not an excuse to charge exorbitant licence fees! ) , so free enterprise helps control the current high cost of visiting the airport and future increases.

42.	Resident	<p>The plan to restrict off-site parking at Bristol Airport has nothing to do with the welfare of the nearby community but all about money. There is a great need for both off airport parking and overnight accommodation. To deliberately restrict competition is unfair to those who are attempting to scratch a living in this feeble economic climate. Should you implement this ill-conceived plan you are, once again, taking away the public's right to obtain value for money. You will give the airport a monopoly over parking and accommodation which will enable them to extort even more cash from their customers. Bristol airport is one of the few airport in the UK who have no free drop off or pick up parking zones which may give a good insight to the future costs that they will impose. You have allowed BIA to expand rapidly and in doing so you must take into account the needs of passengers arriving and departing. Should you use this draconian plan you will also be throwing men and women out of work and into job centres. Where do you expect them to get work? At the airport perhaps? By all means inspect and licence them (within financial reason) and use that to close down the cowboys but please dismiss this plan.</p>														
43.	Cllr D Jolley	<p>For clarity, can you please explain the "extracted" sentence highlighted in red (and note underlined typo.)</p> <p>If the Article 4 Direction is confirmed it will remove automatic permitted development rights for the storage, parking, cleaning, maintenance or repair of any motor vehicle of any description, provided such use <b>in</b> not in association with the existing lawful use. The direction would also remove automatic permitted development rights to provide moveable structures for the purposes of the controlled use.</p> <p>Should I read this as provided such use is not in conflict with the existing lawful use?</p> <p>I have to say granting this monopoly over parking will make Bristol Airport, as far as I can tell having checked the "go compare" type websites, unique in UK by removing competitive off-site parking firms, A business model I know was certainly operating in Heathrow as far back as the mid-60s...</p> <p>So what tangible benefits are we getting out of it? And will planning applications from existing SME operators be judged by same Green Belt criteria as Bristol Airport's application?</p> <p>Price of 7days long stay Car park</p> <table border="0"> <tr> <td>Bristol</td> <td>£60.99.....(off site operator from £36)</td> </tr> <tr> <td>Southampton</td> <td>£55.99</td> </tr> <tr> <td>Gatwick</td> <td>£46.00</td> </tr> <tr> <td>Heathrow</td> <td>£48.95</td> </tr> <tr> <td>Exeter</td> <td>£29.99</td> </tr> <tr> <td>Liverpool</td> <td>£28.99</td> </tr> <tr> <td>Birmingham</td> <td>£21.00</td> </tr> </table> <p>Not having local knowledge, I have to question with only 5 comments posted to date, how so few local Residents' comments support this proposal and the potential cost risks of an Appeal. regards</p>	Bristol	£60.99.....(off site operator from £36)	Southampton	£55.99	Gatwick	£46.00	Heathrow	£48.95	Exeter	£29.99	Liverpool	£28.99	Birmingham	£21.00
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44.	Backwell Parish Council	<p>Backwell Parish Council met last Thursday and discussed NSC's intention to restrict off-site parking for Bristol Airport customers.</p> <p>They were very much in favour of your proposals to make an Article 4 Direction.</p>														
45.	Resident	<p>I am only too happy for the proposals. Having lived opposite one for 18months cars moving day and night, which has now closed down, in fact the owner now in prison. We now have one just along the road with about 400 cars in it, operating all summer, Felton is surrounded by these parks. These parks also use the layby to park cars, can't wait for it to stop.</p>														

46.	Resident	As a Resident of Redhill this subject is of great concern to all in the neighbourhood. I would therefore like to express my sincere thanks to NSC for this positive action.
47.	Long Ashton Parish Council	Long Ashton PC fully supports the Parish Councils' Airport Association's response to this consultation. It believes that the airport is using its own permitted development rights to develop in the green belt, whilst attempting to remove competition from other parking providers
48.	Backwell Residents	Backwell Residents Association represents over 300 households in the Parish of Backwell which adjoins Bristol Airport and is fully supportive of any action which North Somerset Council can take to enable it to deal with the elimination of unauthorised car parking on green belt land.
49.	Resident	I support fully NSC's action concerning Article 4 Direction to be more effective in restricting off-site airport parking.
50.	Resident	I do not agree with this plan. It should be dismissed. BIA should not be allowed a monopoly on parking. Licence local parking operators, at a reasonable cost, which will provide a revenue stream for the Council as well as allowing people to earn a living. Give the public a choice, encourage free enterprise and competition which should keep prices more reasonable. Any monopoly is a bad thing. It would be good to see the Council operating for the good of all not just the Ontario Teachers' Pension Plan.
51.	Resident	<p>I am a local Resident and user of the airport with no interests in provision of parking. In summary I support the Direction proposed by N Somerset.</p> <p>I recognise that restricting supply of offsite parking could result in a greater monopoly position with the risk of increased parking charges but feel this is outweighed by the disruption to local Residents due to unregulated off-site parking. If a landowner/developer wants to advance a properly thought out and serviced off-site parking area there is presumably nothing stopping them making a proper planning application with supporting environmental evidence for due consideration by the planning authority.</p> <p>However what we are seeing in the area is the springing up of lots of small unplanned parking sites. These are unsightly, give rise to highway access problems - e.g. on the A38 just north of the airport, and cause much fast driving as people drive to sites down country lanes - e.g. Long Lane and are driven between collecting and storage sites. These disruptive impacts on the local environment significantly outweigh any advantages in providing more unregulated off-site parking.</p> <p>The map defining the proposed area seems well thought out.</p>
52.	Cleeve parish council	Cleeve Parish Council agrees with the use of Article 4 to protect the Green Belt and green field land. However, Cleeve Parish Council feels strongly that, out of fairness, that Bristol Airport is also included. This will then protect further encroachment onto Green Belt land and green field land. Cleeve Parish Council also would like consideration to be given to the fact that it is very likely that the car parking will move outside any boundary that is set, for instance into the Yatton area.
53.	Blagdon parish council	<p>Blagdon Parish Council considered its response to this consultation at a meeting of the Parish Council on Tuesday 8th November 2016.</p> <p>The Parish Council agrees with North Somerset Council that temporary and unauthorised car parks for users of Bristol Airport have become a significant problem in recent years; because of their impacts on the landscape, nuisance to local Residents and the road safety implications of unsuitable road accesses.</p> <p>The Parish Council strongly supports the efforts of North Somerset Council to control unauthorised airport car parking and the current proposal for an Article 4 Direction to restrict the exploitation of temporary permitted development rights under the General Permitted Development Order. This proposal should help to reinforce North Somerset Council's enforcement powers to control the increasing nuisance of unauthorised car parks.</p> <p>Blagdon Parish Council believes that the proposed boundary for the area of the Article 4 Direction requires a clear and defensible rationale. However, there is no clear justification for the boundary that is proposed in this consultation. It appears to be based on the A370 to the west/north west, the District boundary to the east/north-east, and the Green Belt boundary to the south west.</p> <p>The Green Belt boundary is not a relevant boundary for the proposed Article 4 Direction. The risk of unauthorised, airport-related car parking is related to proximity to the airport. Most of the parish of Blagdon is within 10 minutes driving time of the airport roundabout on the A38. The proposed boundary excludes parishes that are close to the airport that have already been subjected to unauthorised airport car parking and it excludes the Mendip Hills AONB.</p>

		Blagdon Parish Council therefore calls on North Somerset Council to extend the area covered by the proposed Article 4 Direction further to the south west, to coincide with the District boundary, including all of the parishes of Blagdon, Butcombe, Wrington, Congresbury and Churchill & Langford.
54.	Resident	<p>I have noticed that North Somerset council are trying to get Article 4 Direction enforced, may I congratulate yourself and n-s-c on the sterling efforts to rid our country side of these illegal car parks I fully support any changes which brings about the downfall of these car parks.</p> <p>I feel that it is about time that the necessary legislation was brought in to once and for all stop this illegal practice. Anyone who lives on the edge of these car parks knows only too well of the disturbances we suffer either by headlights, horns, alarms etc. not to mention the racing up and down the field at all hours of the day and night, at times i have experienced a convoy of cars being driven along the fields with headlights on full beam not only disturbing myself but that of my neighbours.</p> <p>In addition we must not forget that these fields are owned by farmers who keep livestock Horses, cattle etc and I know from talking to one farmer in particular that the workers of the car parks leave field gates open at times allowing cows to stray</p> <p>There is also a negative impact in which we the residence suffer in that these car parks do have a devaluing effect on any property within the green belt boundaries surrounding the Airport and which overlooks such car parks. Whilst it can be said the Airport has been granted permission for more parking spaces it does not take away the fact that these illegal car parks continue to spring up to flouht the law for monetary gain</p> <p>Finally, there is also the impact of the increased traffic on the A38 giving rise to potential accidents when these operators pull out or pull into the illegal car parks.</p>
55.	Sutherland Property and Legal Services	<p>The report does not cite the correct legislation. The 1995 GPDO has been superseded by the 2015 GPDO.</p> <p>More importantly, the officer's report does not state that the relevant statutory test has been satisfied (being that it is "expedient" to issue the direction), which is required by Article 4(1).</p> <p>Nor does the officer's report consider or set out any evidence which satisfies the requirement that Article 4 directions related to agriculture and forestry "demonstrate that permitted development rights pose a serious threat to areas or landscapes of exceptional beauty" (PPG reference ID: 13-038-20140306). There is no mention of landscapes of exceptional beauty in the report at all. This is clearly because this test is not satisfied: the areas in question are agricultural fields adjacent a major airport that are not exceptionally beautiful.</p> <p>The Article 4 direction, if issued, will result in a significant loss of rural employment.</p> <p>This is an issue which must be addressed by the Council. The loss of rural employment is contrary to several core planning principles of the Framework. These are the need to "[support] thriving rural communities" and "promote mixed use developments, and encourage multiple benefits from the use of land in...rural areas". It is also contrary to paragraph 28 of the Framework, which provides: "support [for] economic growth in rural areas in order to create jobs and prosperity"; "support [for] the sustainable growth and expansion of all types of business and enterprise in rural areas"; the need to "promote the development and diversification of agricultural and other land-based rural businesses"; and "[support] the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres". That identified needs for parking at Bristol airport are not being met is demonstrated by the continued successful operation of car parking facilities under landowners' 28-day use rights.</p> <p>Landscape concerns must be balanced against the strong policy support for rural economic activity. The car parking activity presently addresses a clear need in the market for less expensive parking, as admitted by the Council in recent planning decisions and thus by issuing the Article 4 direction the fact these customers would be prejudiced, is not considered in the officer's report.</p> <p>BY section 108 of the Town and Country Planning Act 1990 ("the 1990 Act"), where planning permission is refused or is granted subject to conditions other than those imposed by the GPDO then section 107 applies as though the Council has revoked the permission under section 97 of the 1990 Act. By section 108(2A) any application for planning permission upon which a claim for compensation is based must be made before the end of the period of 12 months beginning with the date on which the Article 4 direction came into operation.</p>

		<p>The officer's report notes that "compensation can only be based upon any work carried out which is rendered abortive by the direction (this is most unlikely to apply) and for loss or damage which is directly attributable to the direction". It goes on to note that "...due to the continuous movement between different sites it would be difficult for any of the current airport car parking operators to demonstrate that any loss of profit is confined (sic) to a particular site at a particular given time." This statement does not appear to be based on any concrete evidence and therefore the officer's (apparent) view that claims for compensation would not be so substantial as to warrant reconsideration of whether to issue an Article 4 direction or not should be treated with caution. It is understood that compensation could be significant based on each operator being required to make application for each individual field owned and operated for the 28 day purpose.</p> <p>The officer notes that any risk of compensation claims "could also be reduced by the granting of planning permission within the first 12 months of the direction taking effect". We would support this conclusion. However, at no time have the Council granted consent for airport parking operators either by way of application or under Ground A enforcement challenges. It has been mooted in the past that the Council would consider allocating parking to meet the identified need and thereafter consent parking in the allocated area. No such action has been taken by the Council.</p> <p>The undated officer's report upon which any Article 4 direction would be based fails to identify, let alone satisfy, a number of requisite tests. It also fails to take into account highly material considerations being the loss of rural employment, for which there is strong policy support, and the likelihood that the Council will face significant claims for compensation. It is quite likely that any decision which is based upon this report would be amenable to legal challenge.</p>
56.	Resident	<p>Why cannot these "unauthorised" parking be given planning permission (if local Residents are in agreement) as The Green Belt has already been encroached on by the airport. The "official" parking at Bristol Airport is both expensive and is not user friendly for older people (being on a steep slope up to the airport terminal). Bristol Airport has a monopoly, at the moment, on both parking and taxi services which is unfair to users.</p>
57.	Resident	<p>this is a waste of time the car parks set up to give cheaper airport parking I've used are on Brown fill sites not green belt land .</p> <p>Let us have some competition for parking the airport parking charge is too dear at the moment if you take away competition they will put up the charge more and more. Bristol airport must be the worse regional airport in the country you have to collect passengers and it's got the worst facilities I have ever experienced in the world Don't stop of the airfield car parking and make it even worse</p>
58.	Historic England	<p>Thank you for notifying us of plans relating to the Article 4 Direction to remove permitted development rights granted by Schedule 2, Part 4, Class B of the Town and Country Planning (General Permitted Development) Order 2015. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.</p> <p>It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.</p>
59.	Flax Bourton Parish Council	<p>At the Flax Bourton Parish Council meeting on 8th November this proposal was discussed and I would like to submit the following comment on the Council's behalf - It is supportive of the proposal but would like to ensure that North Somerset Council has alternative provisions to meet the demand for airport parking, so that a consequence of the Direction is not long-term street parking in the surrounding areas.</p>
60.	Banwell Parish Council	<p>At a meeting of the Parish Council on November 14th 2016 the council voted to support North Somerset's Article 4 Direction to remove permitted development rights granted by schedule 2, part 4, Class B of the town and country planning (General Permitted Development) Order 2015.</p>
61.	Butcombe	<p>We fully agree with the proposal to use Article 4 as a step to providing greater protection for the Green Belt. However, this instrument has limitations and little real progress will be made until North Somerset Council develops an integrated strategy for dealing with all aspects of the issues around airport parking. This should be done through a supplementary planning document or possibly the Site Allocation Plan currently open for consultation. The instrument should also apply to Bristol Airport, where NSC has inexplicably reversed its decision to require a multi-storey car park, and include the creation of permitted sites (working in conjunction with parish councils) to allow a competitive approach to off-airport parking.</p>

62.	Butcombe parish council	<p>The proposal to restrict unauthorised offsite parking is strongly supported by Butcombe Parish Council. Apart from helping to protect the Green Belt this proposal will reduce the growing risk of serious traffic accidents resulting from excessive vehicle movement in inappropriate country lanes. In addition, illegal off-site car parking causes considerable disturbance to the local community in terms of noise (often at anti-social times) and litter and general nuisance.</p> <p>Many local Residents have expressed increasing concern, but it appears that North Somerset Council do not have the resources to monitor, let alone control such parking, and such enforcement action as has been taken doesn't seem to have long term effect.</p> <p>We are most concerned however that North Somerset Council apparently do not propose to take enforcement action until 2018. The delay is in our opinion completely unjustified, and is likely to have the perverse effect of increasing unauthorised parking over the next twelve months. We ask the Council to commit to action much sooner.</p> <p>We also believe that North Somerset Council should be taking a much more strategic approach to the whole issue of access to as well as parking for the Airport. There appears to be a need for more parking, but this must be properly regulated, on appropriate sites, and not at the expense of the Green Belt.</p>
63.	Resident	<p>I strongly object for the following reasons;</p> <ol style="list-style-type: none"> <li>1) Anti competition - this is handing a monopoly to BIA, this prejudices local people who benefit nothing from the airport if these restrictions are placed upon them. Currently they have to put up with noise and air pollution along with traffic congestion.</li> <li>2) Should the article 4 be successful I fail to see what will stop BIA from needing additional greenbelt land to be permanently disfigured for surface car parking as there will be an increased demand for the monopoly created. What surface parking there is has little mitigation and is permanent, impacting severely upon the green belt.</li> <li>3) The temporary 28 day uses are clearly of considerable less impact on the green belt than an extension of the surface parking at BIA, which is in a single location and of permanent construction. Therefore any article 4 directive should be placed on BIA land to reduce the impact of the car parking and encourage alternative modes of transport away from the private motor vehicle.</li> <li>4) Before any further parking is allowed at BIA a real effort should be made to reduce car reliance by public transport. More cars = more Carbon emissions. There is no mass transit system to BIA and it is likely that there never will be given the cost and location of the airport, this will only increase car usage as the number of flights and destinations continues to increase</li> <li>5) the operating hours of the airport should be restricted to hours that are not anti-social to benefit the living conditions of all those affected by planes flying over late at night. These anti-social operating hours further compound the reliance on the private motor vehicle as public transport operates to social hours</li> <li>6) there are clearly a number of things the council can do to lower parking reliance and thus the impact on the green belt rather than penalise a few temporary car parking operators by way of this ill thought out article 4 directive</li> </ol>
64.	Resident	<p>As a Resident with no financial interest in parking I welcome North Somerset Council's action against illegal airport car parking, especially in areas where this entails encroachment on the green belt and the increase in cars makes traffic congestion and accidents more likely.</p> <p>It is useful that you have put this out for consultation but in future it is worth noting that the notices posted are difficult to understand, there is no information on the council website that clearly explains all the issues, and several Residents have told me that they are worried about commenting because of the possible repercussions.</p> <p>The Article 4 direction is worthwhile only if three other strategies are pursued by NSC:</p> <ol style="list-style-type: none"> <li>1. The airport can only develop car parking on green belt land (e.g., on the south side outside of the Silver Zone) after it builds the multi-storey car park, for which it was given permission several years ago. I attended the Planning meeting (14th September) when the airport argued that there is no demand for expensive parking. But the airport could view the multi-storey car park as a longer-term investment and keep the costs down for customers.</li> </ol>

		<p>1. There is a danger that the Council is creating a near monopoly for the airport over car parking. Better opportunities should be provided for off site operators in appropriate sites decided in consultation with the parishes and Residents. Plus the Article 4 Direction should apply to the permitted development rights of Bristol Airport too with regard to future applications. They should not be allowed to have parking on the green belt any more than any other businesses.</p> <p>2. I would like to see a Supplementary Planning Document, or revised current strategy, with a pro-active and co-ordinated approach to parking, which benefits local small businesses and Residents but also protects green belt land. This could encourage the BIA to provide public transport and ride and ride options. An SPD would also contribute to saving NSC planning officer time and budget costs by providing a clear and effective framework for dealing with both planning applications and illegal car parking activity and would therefore comply with National Planning Policy Guidance paragraph 153.</p>
65.	Resident	<p>I support the proposed Article 4 Direction on the restriction of off-site parking for Bristol Airport because it will both help to protect the Green Belt and also help to reduce the high risk of traffic accidents resulting from excessive vehicle movement in inappropriate country lanes. In addition, illegal off-site car parking causes considerable disturbance to the local community in terms of noise (eg car alarms, night time vehicle engines), associated litter and negative visual intrusion on the local rural landscape character, as well as impacting significantly on North Somerset Council's (NSC) already constrained planning officer capacity and budget.</p> <p>However I would suggest two additions to this welcome initiative –</p> <p>1. The proposed Article 4 Direction should not be at the expense of permitting more on-site parking at Bristol International Airport (BIA) in the Green Belt. I am already concerned at NSC's decision on 14 September 2016 to waive the planning obligation on BIA to build a multi-storey car park before developing further Green Belt car parking. This Article 4 Direction should not therefore be indirectly allowed to facilitate an effective BIA monopoly over airport parking and especially not on current Green Belt land.</p> <p>2. There may be non-Green Belt capacity for sustainable off-site airport car parking that would benefit local businesses, Residents as well as BIA customers and I would therefore like to see a considered and integrated strategy for this developed as soon as possible by way of a Supplementary Planning Document on Airport Parking for BIA. This should include consideration of safe vehicle movement routes, public transport opportunities and park &amp; ride options and of course the construction of BIA's on-site multi-storey car park. An SPD would also contribute to saving NSC planning officer time and budget costs by providing a clear and effective framework for dealing with both planning applications and illegal car parking activity and would therefore comply with National Planning Policy Guidance paragraph 153.</p> <p>Subject to the above points, I support the proposed Article 4 Direction.</p>
66.	Resident	<p>This proposed action to remove the scourge of illegal parking from the land surrounding the airport is very welcome even if it has taken since 2002 to make the proposal. Two questions arise immediately:</p> <p>What enforcement measures are available to the Council when the proposed limitation is introduced, and will they be any more effective than the measures used so far?</p> <p>The Parish of Butcombe appears from the proposal map to have been excluded from the area of limitation. This must surely be a mistake since the abuses of land use for car parking in Butcombe are extensive, increasing, and have persisted for many years.</p>
67.	Barrow Gurney Parish council	<p>The Barrow Gurney Parish Council supports North Somerset Council's proposed Article 4 Direction to remove permitted development rights for the storage, parking, cleaning, maintenance or repair of vehicles within the designated area around Bristol Airport.</p>
68.	Resident	<p>I am very distressed to read of your proposals to ban the use of privately owned land around Bristol airport to be used for parking. I believe your decision to be blatant support for the already exploitive operating procedures of Bristol Airport.</p> <p>I further believe that land owners should be able to make use of their land, within limits, for whatever purpose they choose, as long as it does not impact on others; car parking is hardly intrusive or disturbing. More importantly I believe the local population should have the opportunity and choice to park at prices that are more competitive than Bristol airport which is already greedily exploiting people with drop off charges, trolley charges and general poor customer service. As you are aware there is a dirty of public transport to reach the airport.</p>

		<p>I sincerely ask you to further consider your decision and not to support Bristol Airport's monopoly on parking, but instead to work for the electorate in providing support in trying times rather than reducing choice and causing more expense.</p>
69.	Resident	<p>A few years ago there were calls for these off site car parks to be closed and Councillor Burden said it was an "inappropriate use of green belt land". I wonder whether he objected when the vote was taken to allow the airport to expand the Silver parking zone, which sits on green belt land!</p> <p>I don't use the airport much, maybe once or twice a year, but am a supporter of off-site parking and as someone who always uses the Airport Tavern for parking, I find it convenient and relatively cheap, certainly cheaper than getting a taxi both ways. Bristol Airport is my airport of choice as I live in North Somerset and it is much more convenient than going to Gatwick, the last time of which took me 5 hours to return from, whilst I can be home in 25 minutes from Bristol.</p> <p>I recently had to go to Belfast on business and parked at the Tavern. It cost me £15 for two nights whilst the quote from the airport was £63. I could have put this through the business but thought this was a little excessive, especially as the website said parking from £4.36 day - which, inevitably, I couldn't find! We are told that competition is good as it keeps prices down and by giving a monopoly to the airport this will inevitably allow them to charge what they want. They already charge for us to drop off and pick up fellow travellers and have to pay to use the trollies. Food and drink is already expensive at the airport and this proposal, if it is accepted, will be another cost added to a holiday.</p> <p>In conclusion, I am against an attempt to stop and close down these site, but you should not allow others to spring up.</p>
70.	Burrington Parish Council	<p>Burrington Parish Council considered its response to this consultation at a meeting of the Parish Council on Monday 7th November 2016.</p> <p>The Parish Council agrees with North Somerset Council that temporary and unauthorised car parks for users of Bristol Airport have become a significant problem in recent years; because of their impacts on the landscape, nuisance to local Residents and the road safety implications of unsuitable road accesses.</p> <p>The Parish Council strongly supports the efforts of North Somerset Council to control unauthorised airport car parking and the current proposal for an Article 4 Direction to restrict the exploitation of temporary permitted development rights under the General Permitted Development Order. This proposal should help to reinforce North Somerset Council's enforcement powers to control the increasing nuisance of unauthorised car parks.</p> <p>However, your email to Town &amp; Parish clerks, dated 20th October 2016 is incorrect in suggesting that the problem is specific to the Green Belt. There is, or has been, unauthorised airport car parking in the parish of Burrington (e.g. at the former garden centre site in Burrington Combe) and there have been unauthorised car parks in adjoining parishes (e.g. the Mushroom Farm at Stock Lane in Churchill and Langford).</p> <p>Unauthorised car parks are inappropriate development in the countryside generally. The Mendip Hills Area of Outstanding Natural Beauty should be subject to greater rather than less protection than the Green Belt because of the impacts of unauthorised car parking on the landscape.</p> <p>Burrington Parish Council believes that the proposed boundary for the area of the Article 4 Direction requires a clear and defensible rationale. However, there is no clear justification for the boundary that is proposed in this consultation. It appears to be based on the A370 to the west/north west, the District boundary to the east/north-east, and the Green Belt boundary to the south west.</p> <p>The Green Belt boundary is not a relevant boundary for the proposed Article 4 Direction. The risk of unauthorised, airport-related car parking is related to proximity to the airport. Most of the parish of Burrington (including sites in Burrington Combe) is within 10 minutes driving time of the airport roundabout on the A38. The proposed boundary excludes parishes that are close to the airport that have already been subjected to unauthorised airport car parking and it excludes the Mendip Hills AONB. Burrington Parish Council therefore calls on North Somerset Council to extend the area covered by the proposed Article 4 Direction further to the south west, to coincide with the District boundary, including all of the parishes of Wrington, Congresbury, Churchill &amp; Langford, Blagdon and Butcombe.</p>
71.	Resident	<p>I wish to register my support for the proposed Article 4 Direction. However The delay in initiating enforcement action until 2018 seems unnecessarily long I am very concerned about the effect on the Green Belt and the excessive traffic in country lanes. The illegal parking sites have considerable impact on the local community in terms of noise and disturbance especially at night I fully support this direction and any action which NSC can take to alleviate this problem</p>

72.	Natural England	We can see no way that an Article 4 Direction to remove permitted development rights would have a detrimental impact on the natural environment. Without knowing the area well, nor the severity of the issue, we cannot provide a definitive view, but it would seem reasonable that removing this permitted development right would have a positive impact on the landscape in general, and may have a positive impact on the Mendip hills AONB in particular. Insofar as these are the case, we support the Article 4 Direction.
73.	Resident	We fully support North Somerset Council's application to eliminate car parking on green belt land around Bristol Airport. The fields around the Airport are on eyesore that makes our village look scruffy. The Council's application will help reduce the excessive vehicle movement in our lanes, the general nuisance and the noise at unsociable hours. We are delighted that this action is underway.
74.	Kingston Seymour Parish Council	Kingston Seymour Parish Council agrees in principle with the proposed use of Article 4 to protect the Green Belt and green field land.  However, we have two specific issues:  1 - We believe that all land owned by Bristol Airport must be included in the restrictions and  2 - We do not believe that the boundary as drawn will have the beneficial effect desired by North Somerset Council.  Once a traveller has decided to "trade" a saving in the overall fee for car parking for a mini bus ride from a remote car park, it is of very little consequence if that journey takes 10 minutes or 20 minutes in their overall "journey to the plane" experience. We feel that the very limited extent of the boundary area will simply push the problem to other areas just outside that boundary - Langford, Yatton, Chew etc.. If that spread is to be controlled, the area possibly needs to be extended to the North Somerset boundary in the North, the M5 in the west and the A37 in the east.
75.	Parish Councils Airport Association	The Parish Councils Airport Association (PCAA) consists of representatives of parish councils which are concerned about the impact, or future impact, of the activities of Bristol Airport. It has a membership of 17 parishes. The PCAA responds to consultations and reports back to its membership on current issues relating to the aviation sector.  The PCAA welcomes a consultation on Article 4 Direction Airport Parking. The PCAA commences by pointing out that it is not just the activities of off-site car parking which have a significant impact on the living conditions of Residents and the well-being of the environment but also the activities of Bristol Airport (BA).  The PCAA is surprised that no background information has been written for this consultation in order that Residents and parishes are able to make an informed decision on Article 4.  The issue of off-site car parking is driven by operators wishing to receive some revenue from car parking but who are unable to take part due to the Green Belt and other green field land. Meanwhile BA under 'Special Circumstances' is allowed to park cars in the Green Belt within its boundary. Around 80% of all airport-related car parking is within BA's operational boundary; 20% is off-site on legal and illegal car parks. Please note the PCAA is using figures from a BA document. (Application 16/P/1455/F Transport Document submitted by BA 'Transport Statement', section 4.9.)  The PCAA believes that car parking revenue is critical to BA and they clearly have a vested interest in minimising the provision of off-site parking.  Although off site car parking has been a problem since 2002, BA has exacerbated the problem by not building a multi-storey car park as stipulated by planning application 09/1020/OT2 under a condition.  In 2016, BA has submitted four applications to North Somerset Council relevant to the issue of car parking. These applications are outlined below.  The first application (16/P/0454/PAI) is for approximately 200 car parking spaces in Green Belt on the south side outside of the Silver Zone area. The PCAA objected to this application as it extends the number of car parking spaces on the south side to over 12,000 (the maximum figure agreed under the planning approval in 2011) Secondly the PCAA objected that this land use was not in the original planning application and was contrary to the land use of the planning consent 106 Agreement, Condition 20. The land use was for car rentals and not surface car parking. This first application was granted under permitted development rights as these rights were not removed at the time of the original planning consent.  Note that Article 4 Direction takes away permitted development rights to other operators outside the airport. The PCAA requests that the Article 4 Direction covers the permitted development rights of Bristol Airport as well. This is because the PCAA anticipate future applications from BA for Green Belt land to be used for car parking on

	<p>the south side within and outside its boundary and on green field land. The reason for requesting the removal of BA's permitted development rights is that providing low-cost car parking is against North Somerset Council's own policies in which people are encouraged to use public transport. The PCAA understand that permitted development rights can only be removed on a boundary change. The PCAA request that when BA changes their boundary permitted development rights are removed. Secondly, the use of 'Special Circumstances' allowing car parking on the Green Belt at the airport distorts the market resulting in BA having a near-monopoly position.</p> <p>In regard to removal of permitted development rights the PCAA believes that the Park and Ride as shown on the consultation map should be allowed to expand as this area is close to the Metobus and the Airport flyer and has the potential for airport car parking.</p> <p>The second application (16/P/1440/F) is for land outside the south side for 196 staff car parking spaces. It is a temporary measure as when the eastern apron extension is built the staff parking will go to the Silver Zone area as planned. This application was approved 9 November 2016. The site is within the Green Belt and was not included in the original application for car parking. The PCAA has objected to this application as it contradicts NSC policies such as CS4 nature conservation, and policies on Green Belt. It is, again, outside the original planning consent.</p> <ul style="list-style-type: none"> <li>•The third application (16/P/1455/F) is for a five story multi-story car park to be built in two phases. The proposed scale and phasing present major changes from planning conditions. This application has been passed at the NSC Planning and Regulatory Committee on 14 September 2016 and further approved at a NSC Planning and Regulatory meeting 9 November 2016.</li> </ul> <p>The PCAA welcomes a multi-storey car park but is disappointed that the Cogloop Land (application 16/P/1486/F see below) is being allowed to be used for car parking in the meantime.</p> <p>By accepting these applications, NSC has shown that they are quite prepared to waive conditions designed to protect the green belt. The PCAA has no confidence that this will not happen again and believes that the multi-storey car park may never be delivered as it is the costlier option. It is always cheaper to park cars on green fields than build a MSCP. Although a condition has been placed on this application by North Somerset Council to remove Cogloop land from use in summer 2018, Bristol Airport can always seek to change the condition as they have done previously by submitting a full application to the Council claiming, again, changing demand and circumstances.</p> <p>The fourth application this year (16/P/1486/F) is for the seasonal land mentioned above. This land is known as C1 and C2 (or Cogloop Land). This application passed at the NSC Planning and Regulatory Committee on 14 September 2016 bringing forward this land for car parking. Following the meeting the PCAA submitted a formal complaint to North Somerset Council. This application was approved at the Planning and Regulatory Committee meeting on 9 November.</p> <p>These applications submitted by BA show that the airport has not developed as envisaged. When numbers reach 10 mppa predicted in 2024, there will be over 12,000 cars on the south side in Green Belt land. Note that in the officer's report to the Planning and Regulatory Committee on 14 September he stated that the scale proposed within the Silver Zone area is inappropriate development and does not preserve the openness of the Green Belt but it was allowed under 'Special Circumstances'. The Highways report to the Committee states 'the lower cost of being able to park within the Silver Zone does impact on the propensity for customers to use public transport' but again it was permitted. These reports are within the case file application 16/P/1468/F. The use of 'Special Circumstances' has allowed BA to establish a near-monopoly share of all car parking within the area.</p> <p>The PCAA, which represents 17 parishes which, in turn, represent thousands of Residents believes that the problem of off-site car parking for Bristol Airport will never be resolved until a different planning approach is taken. Suggestions are outlined below:</p> <p>A call for car parking sites is made within the area by North Somerset Council with some sites being awarded 'Special Circumstances' as enjoyed by BA. These sites must have the support of parishes, if not no planning consent should be granted. There will be some sites in the surrounding area which may be suitable and brought forward. The Park and Ride could become an area suggested for airport car parking linked to the Metrobus and the Airport Flyer.</p> <p>A Supplementary Planning Document on off-site car parking is written in consultation with parishes, Residents, off site car parking operators and BA. The PCAA is aware that BA may object to any other sites coming forward as BA relies heavily on car parking revenue which is part of their business model.</p> <p>The PCAA supports Article 4 but believes it should be used in for the protection of the Green Belt and other green field land.</p> <p>The PCAA requests that no further use of 'Special Circumstances' is granted to BA in the future. Bristol Airport has already had the benefit of 'Special Circumstances' and further use at BA undermines policies within the NSC Core Strategy. No other sector would be allowed over 12,000 cars parked in Green Belt land in a rural landscape.</p>
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76.	Bath and North East Somerset	<p>Bath and North East Somerset Council fully support North Somerset Council's proposed Article 4 Direction. The unauthorised use of land for parking is both harmful to the openness of the green belt and prejudicial to highway safety particularly given most of the sites currently being used are in unsustainable locations with many accessed by narrow lanes. Given the proliferation of the issue and the lengthy enforcement dealings North Somerset have had in trying to curb the issue, an Article 4 Direction is an appropriate course of action. With regard to the proposed boundary it is noted that Nempnett Thrubwell (located in the Bath &amp; North East Somerset administrative area) projects into North Somerset and therefore there is a risk of the problem spreading across the boundary. Bath &amp; North East Somerset Council are already dealing with a number of unauthorised airport car parks against which formal planning enforcement action is being pursued however we anticipate the issue escalating in our area, it is confirmed therefore that Bath &amp; North East Somerset Council are looking to bring in a similar Direction and will work closely with North Somerset to deal with the issue.</p>
77.	Holiday Extras	<p>This submission has been prepared jointly by Savills and Tim North &amp; Associates Ltd who act on behalf of Holiday Extras Limited ("HX") and Airparks Services Limited ("Airparks"), being directed at the North Somerset Council Article 4 Direction seeking the removal of permitted development rights restricting off airport car parking in the general locality of Bristol Airport.</p> <p>HX is the largest distributor of holiday-related products (including car parking, hotels and lounges) in the UK.</p> <p>HX currently distributes on- and off-airport parking at 17 UK airports; on-airport parking at six UK airports and off-airport parking at three UK airports.</p> <p>Airparks is an associated company of HX. Together, HX and Airparks provide airport car parking to over 2m customers per year.</p> <p>HX object to the proposed introduction of the Article 4 Direction because it will reduce choice and flexibility in the provision of long term off- airport car parking products, and as such place Bristol International Airport (BIA) in a dominant or monopolistic position in the provision of airport related car parking.</p> <p><u>The Need for Choice</u></p> <p>In pursuing an Article 4 Direction a local authority must fully understand and justify the consequences of the restrictions should the proposed Direction be confirmed. In this case the local authority will be handing a virtual monopoly in respect of airport related car parking to BIA. The consequence of doing this will be that supply and demand will be predominantly controlled by the airport which results in very little consumer choice for airport car parking beyond the constrained 'products' that the airport offers.</p> <p>The only off-airport car parking provision acceptable to your Council, and beyond that provided by BIA, is for passengers staying in overnight accommodation in accordance with Policy DM30 of the Development Management Policies Part 1 DPD. This situation is required to be assessed in the context of the initial findings of the CAA in its document entitled "Consultation on Issues Affecting Passengers Access to UK Airports: A Review of Surface Access" (CAP 1364):-</p> <p>"3.25 Independent airport car parking operators provide competition to long-stay car parking at the airport, which is likely to bring benefits to consumers in terms of value and choice.</p> <p>However, to do so effectively, they require access to the facilities at or near the airport's forecourt (sometimes the airport's short-stay car parks)."</p> <p>Is the Proposed Article 4 Direction Compliant with the NPPF</p> <p>The adoption of the Article 4 Direction will result in there being no responsive or flexible mechanism to meet unmet demand because the council cannot require the airport to deliver further parking if the Airport Owner wishes to maintain its dominant position and, as a consequence, control price. This position is wholly anticompetitive and goes against the principles of sustainable economic development as set out in the National Planning Policy Framework / Practice Guidance, and, significantly, the objectives of the Competition Commission.</p> <p>This tension in restricting choice available to airport passengers as a result of concentrating virtually all airport related car parking on-airport, will not be resolved through the Article 4 Direction. On the contrary, this will only exacerbate the existing situation regarding unauthorised off-airport uses, with disadvantages for both reputable long term off-airport car parking companies as well as your Authority.</p> <p>Disreputable operators may decide to submit applications on land to which the Article 4 Direction applies, and then, so long as the requisite steps are taken, claim compensation from your Authority in accordance with Section 108 of the Town &amp; Country Planning Act 1990 (As Amended). This can lead to particularly heavy penalties</p>

	<p>for an Authority, a matter evident from the synopsis of the decision <i>Carter v Windsor &amp; Maidenhead Royal Borough Council</i> (1988) EG CS 84 attached to these representations.</p> <p>In adopting a more positive role, choice would no doubt be assisted if your Authority was to ensure through a legal agreement associated with future planning applications for on-airport car parking, or indeed by BIA itself, selling or leasing parking space on-airport in excess of a stipulated market share. However, it would be necessary to ensure that such leasing arrangements do not allow the airport operator control over car parking spaces, whilst rent should not be turnover related.</p> <p>Taking the above into account, it should be noted that Section 4 of the NPPF and its supporting PPG at Paragraph 33 set out that when planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in servicing business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.”</p> <p>NPPF Paragraph 160 goes on to state that:</p> <p>“Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:</p> <ul style="list-style-type: none"> <li>· work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and</li> <li>· work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.</li> </ul> <p>Supporting these two NPPF paragraphs is the following text of the PPG:</p> <p>“Planning Practice Guide Paragraph: 012 Reference ID: 54-012-20150313</p> <p>What should be considered in regard to the development of airport and airfield facilities and their role in serving business, leisure, training and emergency service needs?</p> <p>Aviation makes a significant contribution to economic growth across the country, including in relation to small and medium sized airports and airfields (aerodromes). An aerodrome will form part of a larger network.</p> <p>Local planning authorities should have regard to the extent to which an aerodrome contributes to connectivity outside the authority’s own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the National Planning Policy Framework. As well as the National Planning Policy Framework, local planning authorities should have regard to the Aviation Policy Framework, which sets out Government policy to allow aviation to continue making a significant contribution (National Planning Policy Framework paragraph 160).”</p> <p>The wording of the above key paragraphs places a requirement on local authorities to plan positively for new airports and aerodromes. This is to ensure that the economic benefits of these facilities can be captured not only by the local authority that the facility falls within, but also by those that are on its borders and could also contribute to sustainably meeting associated economic development needs. This approach is one of fostering</p> <p>and supporting economic growth and therefore requires the development needs of the local area to be assessed and articulated through a Local Plan.</p> <p>The introduction of the proposed Article 4 Direction would run counter to the approach of the NPPF and introduce a policy position whereby your Authority would be transferring its development management responsibilities in the provision of airport related car parking, both now and into the future, to a private organisation in the form of BIA. This is in contrast to what should be expected of a local planning authority, namely to identify, robustly test and plan for the most appropriate scenario having considered reasonable alternatives through the required process of Sustainability Appraisal / Strategic Environmental Assessment.</p>
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		<p>It is evident that no SA/SEA process has been undertaken in support of the Article 4 Direction. It is our professional view that alterations to permitted development rights resulting in a policy on approach to managing development are required to be assessed through SA/SEA. We would therefore recommend that the appropriate process of assessing reasonable alternatives is undertaken and re-consulted on if your authority seeks to pursue confirmation of the Direction.</p> <p><u>The need for Airport Car Parking</u></p> <p>In assessing the need for the Article 4 Direction, the Authority will appreciate that in June 2009 between 1,000 and 1,500 cars were parked on unauthorised long term off-airport car parking sites, contributing to approximately 15% of total long term car parking provision. During the intervening period, and certainly since 2002, this situation has become increasingly worse, as the contents of the report from the Executive Member for Strategic Planning, Highways, Economic Development and Housing to the Director of Development and Environment in August of this year confirm. (Decision No. 15/16 DE 162 refers).</p> <p><u>Will the Article 4 Direction Solve the Problem?</u></p> <p>Unless a more proactive approach is taken towards providing a reasonable choice in terms of long term airport related car parking provision, a factor acknowledged by third parties responding to Application No. 16/P/1440/F, additional resources will need to be expended by the Authority in controlling this land use.</p> <p>The introduction of the Article 4 Direction, in spite of the fact that 85% of passengers accessing BIA in the future will continue to rely on the private car, will not resolve the issue of unauthorised off-airport car parking, a matter confirmed by the report the subject of Decision No. 15/16 DE 162 in which it was stated:-</p> <p>“the making of an article 4 direction will not solve the problem but will be an effective part of the tool kit and enable officers to monitor and enforce against problematic sites more effectively”</p> <p>In conclusion we object to the proposed Article 4 Direction because it undermines choice in the airport parking markets and will have unintended consequences for the authority. In addition, the process should be subject to SA/SEA and the consideration of reasonable alternatives; an approach which has not been undertaken in support of the current consultation.</p>
78.	Wrington Parish council	<p>This is a comment by Wrington Parish Council (the Council) in response to a public consultation on a proposal by North Somerset Council (NSC) to remove permitted development rights granted by Schedule 2, Part 4, Class B of the Town and Country Planning (General Permitted Development) Order 2015 by way of an Article 4 Direction.</p> <p>We have noted that should the Article 4 Direction be confirmed it will remove 'permitted development' rights for the storage, parking, cleaning, maintenance or repair of any motor vehicle of any description, provided such a use is not in association with the existing lawful use of the land. The Direction would also remove 'permitted development' rights to provide moveable structures for the purposes of the controlled use.</p> <p>We also note NSC's statement that; 'Temporary car parking sites for Bristol airport customers have become particularly problematic in the Green Belt since 2002. Despite the council (NSC) issuing numerous enforcement notices, stop notices and pursuing successful prosecutions over a number of years the issue still persists. This has a significant effect on the living conditions of local Residents and the wellbeing of the area. Although the council is constantly monitoring the problem, the off-site airport parking operators continue to exploit permitted development rights by operating in excess of the 28 days permitted under the General Permitted Development Order. The length of time the council has been trying to tackle this problem, along with the number of complaints logged, indicates the difficulty in keeping control over the number of unauthorised car parking sites currently operating and these numbers are not diminishing'.</p> <p>We acknowledge and agree with this statement and its objectives, although we feel that there are issues raised by the proposed Article 4 Direction, in particular with the plan attached to the public notice. We feel strongly that the area boundary must be reconsidered as no justification has been made for its extent.</p> <p>We are aware that other parish councils have differing views on this proposal, with some in support, but others apparently of the opinion that off-site, or unauthorised airport car parking, should not be controlled in this way. However, we cannot agree with the view that this form of parking should not be more tightly controlled, although we feel that some amendment to the consultation draft is essential.</p>

		<p>For example, we have been provided with a copy of Burrington Parish Council's response to the consultation, which raises the matter of unauthorised car parking outside of the Green Belt. Burrington point out that airport-related car parking has been experienced within the AONB (Burrington Combe) and at the mushroom farm site on Stock Lane (Churchill parish). Our understanding is that there has in the past also been unauthorised parking on a site off the A370 to the west of Congresbury.</p> <p>This highlights the inevitable fact that the Article 4 Direction as proposed would result in car parking being displaced outside the area shown on the map, either to other land within the Green Belt or more probably to the Wrington Vale countryside. This high value land lies between the Green Belt and the AONB and would be at serious risk of damage unless the area to be designated is revised.</p> <p>Therefore, the Council will support the proposal but only on condition that the area concerned is extended to the south and west to include all of the parishes of Blagdon, Burrington, Butcombe Churchill, Congresbury and Wrington. If not, it will not work, impacting on Residents in these parishes, seriously damaging the landscape and creating ongoing work for Enforcement Officers, and incurring additional costs for NSC. We expect the boundary to be re-drawn to include these specific parishes. If the boundary is not to be revised as such then the Council objects to the proposal.</p> <p>At the same time, it is recommended that NSC contacts B&amp;NES and Mendip District Council and informs them about the proposal, the aim being to ensure a consistent approach so that car parking is not further displaced outside the North Somerset boundary.</p> <p>On a final point, there has been a suggestion from another parish council that the proposal would affect their ability to allow cars to be parked for more than one day in association with occasional local events, the Balloon Fiesta for example. This could be addressed through a variation which allows any parish council to permit car parking for a specified longer period of time, say five days maximum, either on land owned by the parish council, or where the parish council has given permission in writing. This would allow for some reasonable local variation while introducing responsibility at the local level.</p>
79.	Bristol Airport Ltd	<p>Bristol Airport recognises the detrimental impact on the local Green Belt and Residents, as described by North Somerset Council, caused by the long-standing exploitation of permitted development rights for informal car parking within the open countryside. The Airport shares the Council's concerns with regard to the significant strain on limited public resources, in relation to monitoring and enforcement, and is concerned also at the wider degradation of the Somerset landscape and the subsequent negative impression given to visitors from elsewhere in the UK and abroad. On this basis, Bristol Airport is therefore fully supportive of the proposal to remove permitted development rights as set out within the proposed Article 4 Direction.</p>
80.	North Somerset IDB	<p>The North Somerset Levels Internal Drainage Board is the Land Drainage Authority for areas of special drainage need. It has a duty to supervise all matters relating to the drainage of land. The Board has jurisdiction and powers relating to all ordinary watercourses in its area and is required to ensure flood risk, and surface water drainage are managed effectively.</p> <p>The North Somerset Levels Internal Drainage Board supports the proposed Article 4 Direction to restrict off-site parking for Bristol Airport.</p> <p>This is for the following reasons:</p> <p>The proposed extent of the Direction coincides with the Board's area, even though the airport does not.</p> <p>Unregulated parking areas can lead to an increase in impermeable areas. This can increase peak flows and volumes of surface water runoff entering into the rhynes in the board's area. This can increase flood risk and have a detrimental impact on water level management in the Board's area.</p> <p>Parking areas can also have a detrimental effect on water quality. Pollutants such as hydrocarbons and heavy metals can enter into the water environment if adequate mitigation measures are not in place.</p> <p>Parking areas and associated fencing and structures can prevent access to watercourses for maintenance.</p> <p>The removal of permitted development rights would enable additional offsite parking to be controlled by the planning process and both national and local planning policy would therefore apply.</p> <p>Currently these areas have a land drainage system to suit agricultural needs and is maintained to these standards not as developed areas (e.g. car parking an road infrastructure).</p>

		It should be noted that Land Drainage Consent from the Board would be required for any construction with 9m of a watercourse within the Boards boundary, regardless of whether permitted development rights have been removed or not.
81.	Environment Agency	As drawn the boundary of the proposed Article 4 Area would appear to provide a risk of displacement of existing off-site parking to a narrow area that lies east of Redhill and north of Butcombe and which broadly follows the orientation of Long Lane. We understand that this areas falls within the administrative district of Bath and North East Somerset Council.  Land to the east of Long Lane is within Source Protection Zone 1 for Chew Magna public water supply and therefore is particularly sensitive to risks from contamination. We therefore have some concerns that the proposal, as currently presented, may have the consequence of creating a 'parking peninsular' in this area which (although outside of North Somerset's area), may represent a significant increase in risk to controlled waters from that which exists at the present time.
82.	Congresbury Parish Council	At a meeting of the Parish Council Planning Committee on November 28th 2016 the council voted to support North Somerset's Article 4 Direction restrict the exploitation of temporary permitted development rights under the General Permitted Development Order. The Parish Council would also like the boundary to be extended to cover the Parish of Congresbury.

Period - starting 15th June 2016

UK Airports	Silver Zone			
	Airport	1 week	2 weeks	3 days
	Gatwick (LGW)	£83.00	£147.00	£41.00
	Luton (LTN)	£69.49	£113.49	£46.99
	East Midlands (EMA)	£57.99	£79.99	NA
	Birmingham (BHX)	£52.99	£66.99	£37.99
	Leeds Bradford (LBA)	£50.00	£72.00	£32.00
	Cardiff (CWL)	£47.99	£60.99	£26.99
	<b>Bristol (BRS)</b>	<b>£45.99</b>	<b>£64.99</b>	<b>£29.99</b>

Newcastle (NCL)	£43.99	£72.99	£32.99
Stanstead (STN)	£40.11	£72.31	NA
Liverpool (LPL)	£34.19	£38.94	NA
Manchester (MAN)	£29.99	£49.99	NA
Edinburgh (EDI)	NA	NA	NA
Heathrow (LHR)	NA	NA	NA

**BRS Ranking**      **7th**      **8th**