

## Airport report for Chew Magna Parish Council meeting on 7 November 2023

### Do CMPC wish to comment on this proposed response?

**23/P/2331/AIN: Consultation request under the provisions of Part 8 (Class F) of The Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2015 for a proposed electric vehicle charging forecourt and associated hub building. THIS IS NOT A PLANNING APPLICATION. Bristol Airport North Side Road Felton Wrington BS48 3DY**

The PCAA intends to respond shortly before the reply deadline of 20<sup>th</sup> November. An explanation of the proposed response is below, followed by the proposed response itself. **Comments to Nick Tyrell by 14<sup>th</sup> November.**

#### Explanation of response

This "non-application" concerns construction of a proposed electric vehicle charging forecourt which will be located to the south-west of Lulsgate House (by the roundabout entry into the Silver Zone) in an area currently occupied by a short stay car park open to visitors to the airport. The proposed EV charging forecourt will contain 18 ultra-rapid charging bays (up to 350kw, capable of charging a vehicle in approximately 10-15 minutes) and will have a small ("Gridserve Hub") retail store adjacent for users to buy food and drink refreshments while they wait for their vehicle to recharge.

Bristol Airport will be relocating the free waiting area (currently west of Lulsgate House), to the parking spaces immediately west of the development site. The new area will increase capacity but will also offer a more direct access to the proposed hub building with its retail, food and beverage offer. They state this is intended to improve the experience and make the free waiting area more attractive than waiting within nearby residential areas, which can often negatively impact on the local community. They say this relocation is a reorganisation of existing parking spaces and is not considered development. Therefore, it does not form part of this consultation, but they consider it useful to set out the overall intention and the relationship.

BAL state that the EV forecourt is within the operational boundary of the airport and that the vast majority of users will be airport passengers, airport staff, airport visitors and business partners directly related to the airport. Whilst the applicant contends that it constitutes permitted development under the GPDO as stated above, and therefore is not a planning application, it acknowledges that the forecourt **"may attract a very small number of passing drivers on their way to another destination, but these are highway trips that will already exist on the network."** They claim it is **"highly unlikely"** the development will generate additional traffic making specific journeys solely to charge an EV.

We have an alternative view, which we hope will be shared by PCAA members; that passing EV drivers on the A38 will view it as an opportunity, easily accessible, to re-charge their vehicles quickly. Visitors to the airport will soon hear about the facility once it has been constructed and the news of its availability will spread. For travellers passing by, many Satnavs now provide details of recharging facilities, and with waiting facilities and refreshments also available it seems inevitable that it will quickly attract a significant amount of passing trade. This puts it in a very different category to a facility intended solely

for airport staff, airport vehicles or airport visitors, which might qualify as permitted development under the GPDO.

BA's consultation letter states that a similar Gridserve scheme (EV charging forecourt with Hub building) is currently under construction at Gatwick airport and that Crawley Borough Council accepted the development would fall within airport permitted development rights. They offered no objection to the scheme. However no details of that development have been provided so it is difficult to know how similar the proposal was in terms of its location and accessibility to non-airport users.

The GPDO, Schedule 2, Part 8, Class F, states in respect of airport related development: (our highlighting in **Bold**)

### **Permitted development**

**F** *The carrying out on operational land by a relevant airport operator or its agent of development (including the erection or alteration of an operational building) in connection with the provision of services and facilities at a relevant airport.*

### **Development not permitted**

**F.1** *Development is not permitted by Class F if it would consist of or include:*

*(a) the construction or extension of a runway;*

*(b) the construction of a passenger terminal the floorspace of which would exceed 500 sq metres;*

*(c) the extension or alteration of a passenger terminal, where the floorspace of the building as existing at 5th Dec 1988, or if built after that date, of the building as built, would be exceeded by more than 15%;*

**(d) the erection of a building other than an operational building; or**

*(e) the alteration or reconstruction of a building other than an operational building, where its design or external appearance would be materially affected.*

### **Condition**

**F.2** *Development is permitted by Class F subject to the condition that the relevant airport operator consults the local planning authority before carrying out any development, **unless that development falls within the description in paragraph F.4.***

### **Interpretation of Class F**

**F.3** *For the purposes of paragraph F.1, floor space is calculated by external measurement and without taking account of the floor space in any pier or satellite.*

**F.4** *Development falls within this paragraph if—*

**(a) it is urgently required for the efficient running of the airport, and**

**(b) it consists of the carrying out of works, or the erection or construction of a structure or of an ancillary building, or the placing on land of equipment, and **the works, structure, building, or equipment do not exceed 4 metres in height or 200 cubic metres in capacity.****

## Proposed response

The Parish Councils Airport Association has the following comments to make on this consultation submitted to North Somerset Council by BAL.

It is debatable whether the Gridserve Hub building attached to the re-charging compound is an operational building, since its prime purpose is to provide food and drink, and other retail commodities, to people re-charging their vehicles. We presume that the retail offer will be available to anyone wishing to recharge their EV, whether or not they have any association with the airport. It will also serve the free parking area relocated from the site of the EV charging forecourt. Its location just 150m or so from the roundabout giving entry to the Silver zone is likely to attract many EV drivers wishing to recharge their vehicles at an ultra-rapid charging point taking only 10-15 minutes. If, as anticipated, this does become used by drivers with no direct connection with the airport (passengers, staff, airport visitors or business partners) it is difficult to understand why this might be classed as an operational building. It is conceivable that it could also lead to queueing problems in the vicinity of the roundabout.

If it is not classed as an operational building it would appear that it does not meet the requirements of Class F4: a maximum height of 4m and a maximum capacity of 200 cubic metres. Based on the scale attached to the submitted drawings the new building measures approximately 19m x 12.5m, giving an overall ground floor area of 237.5m sq. The building rises to approximately 6m in height, although the major part of it is around 4.5 m high. Nevertheless this results in a cubic content of circa 960 cubic metres.

For these reasons we consider North Somerset Council should require the submission of a full planning application in order that wider consultation can be undertaken and all aspects of the proposal can be considered carefully, including any likely impacts on traffic movements at this busy roundabout junction on the A38.

## **Report on the PCAA meet virtually on Thursday 12 October 2023**

### **Retirement and replacement of the Secretary**

The Secretary Judith Hoskin who has worked tirelessly for the PCAA for 18 years was retiring after completion of the minutes for the meeting! The Chair thanked her on behalf of the PCAA for all her sterling work over the past years. A card, gift and farewell event will be organised by the Chair. Tony Jay who is an experienced Parish clerk has taken over as secretary of the PCAA. The email will remain the same [secretary@pcaa.org.uk](mailto:secretary@pcaa.org.uk).

### **The Finance Report 15 June – 12 October 2023**

The secretary reported that the amount presently in the PCAA account was £7149.54 which includes £3,000.00 from Wrington PC, and £300.00 from Barrow Gurney PC, ring-fenced for legal fees. After payment of her salary, various expenses and fees for the website, and receipt of outstanding subscriptions, the amount would be £6990.87 of which £3,300 is ring-fenced, leaving £3690.87.

It was agreed that the new secretary (Tony Jay) would set up a new account with the Unity Trust Bank [Unity Trust Bank | Socially Responsible, Ethical Business Bank](#) who were highly recommended by several parish council representatives as clerk can set up the payments which are then authorised by councillors.

Unity Trust charges £6 per month.

### **Net Zero/Climate Change/Airport Emissions**

The secretary had received a query whether the PCAA had any information about the Aviation Carbon Transition Programme. [Aviation Carbon Transition Programme \(bristolairport.co.uk\)](https://www.bristolairport.co.uk/aviation-carbon-transition-programme). This is a grant-giving fund to 'kick start and fast track decarbonisation initiatives in the South West. Members were not aware of this, but a member reported that BAL were working with Bae on carbon emissions reduction. The PCAA believe BAL are the only airport currently attempting to tackle decarbonisation of their operation.

### **Parking**

The meeting further discussed the issues brought up by Item **23/P/1637/FUL** - Construction of a 2,700-space temporary car park on Green Belt land (reported in the CMPC October 23 report). Concern was expressed that parking demand might exceed the 800 spaces allocated to meet the increased demand during the 2 years allocated for construction of the public transport interchange (in addition to the 1900 spaces for cars displaced by the unavailability of the land MSCP 2 would stand on). This in turn would lead to more unauthorised off-site parking.

The 28-day rule (which allows use of land for various purposes for that length of time in a calendar year without planning permission) makes it difficult to enforce against parking. There was no further update on an area-wide Article 4 direction to remove the 28-day permitted development loophole.

### **Air Space Modernisation (CAP 1616)**

1.1. Bristol Airport are now working on their consultation preparation for Stage 3 of the CAP1616 process for airspace modernisation. The effect of this will be that some communities will be overflowed that are not at present. It is thought that the consultation might be delayed until 2025. (For more information see here [Airspace Change | Frequently Asked Questions \(bristolairport.co.uk\)](#) )

### **Noise**

The PCAA has commented on the Draft Noise Action Plan 2024 – 2029 and the 2022 Annual Monitoring Report (AMR). BAL had sent the Action Plan to DEFRA for their feedback on 1 September 23.

The AEF were working hard to take the CAA to task about noise from all types of aeroplane.

### Complaints from parishes about unaccustomed overflying and noise

There is an increasing number of complaints to the PCAA from parishes about unaccustomed overflying and noise, the most recent being from Nempnett Thrubwell. Barrow Gurney residents were reporting a smell of aviation fuel.

### **Free drop off area at Bristol Airport.**

1.2. There is a free area for drop off and collection in the Silver Zone. Passengers can then take the free bus to the terminal. This avoids paying the considerable fee (now £7) for the drop off area near the terminal. (For more information see [Waiting Zone | Free Passenger Drop Off and Pick Up Area \(bristolairport.co.uk\)](#))

## **National**

### **New Economics Foundation report**

This is the first comprehensive review since the Government's appraisal in 2012 and aims to address the lack of evidence that underpins the economic arguments for airport expansion. The report can be found here [Losing altitude | New Economics Foundation](#)