

Expansion of Bristol Airport to 12mppa

PINS Ref APP/D0121/W/20/3259234
Planning Application Ref: 18/P/5118/OUT

Proof of Evidence for PCCA

Barrow Gurney Parish Council
Nick Tyrell

Application no. 20/P/2896/APPCON.

PLANNING APPEAL BY BRISTOL AIRPORT LIMITED IN RESPECT OF NORTH SIDE ROAD, FELTON (APPEAL REFERENCE: 3259234) - SUBMISSION OF ENVIRONMENTAL STATEMENT ADDENDUM, PASSENGER TRAFFIC FORECAST, ECONOMIC IMPACT ASSESSMENT ADDENDUM AND UPDATE TO THE PARKING DEMAND STUDY

Response to Consultation on addendum to Environmental Statement and associated documents to Bristol Airport Planning Application 18/P/5118/OUT from Barrow Gurney Parish Council

1. Barrow Gurney Parish Council (BGPC) wishes to confirm its **strong objection** to the proposed expansion of Bristol Airport.
2. BGPC has previously lodged **objections** to proposals for, or related to the expansion of the airport:
 - In January 2019: in respect of application 18/P/5118/OUT
 - In November 2019: in respect of Additional Information supplied to application 18/P/5118/OUT
 - In October 2020: in respect of the Bristol Airport Ltd (Land at A38 and Downside Road) Compulsory Purchase Order 2020.

BACKGROUND TO OUR OBJECTION

3. Barrow Gurney is a rural parish at the northernmost fringe of North Somerset District, bordering Bristol City. The village is approximately 6 miles by road from the City centre and only two miles as the crow flies from the Airport. It is located roughly midway between the A370 (Bristol - Weston super Mare) to the west and A38 (Bristol - Airport - Taunton) to the east. It is rural in character, a diffuse village comprising 4 main component parts:

- the village centre, the core of which was declared a Conservation Area in June 2018, predominantly linear in nature on either side of the B3130 (Barrow Street) which links the A370 and A38. As well as numerous dwellings it includes the Princes Motto pub, a newly established village shop, the village hall and the village green and play area, all of which form the heart of community activity.
- Barrow Court, located on higher ground approximately 1 mile to the west of the village centre. Originally a C13 Benedictine Nunnery it later became a private house; then for a short while a WW2 military hospital and thereafter a College of Education from 1949-1976. It was subsequently divided into 19 separate residential freeholds and forms an important part of the village community, including the Parish Church of St Mary and St Edward. All Court buildings are either Grade 2 or Grade 2* listed.
- Naish Lane area, a cluster of houses located approximately half a mile to the south of the village centre adjacent to the A38 and incorporating the Fox and Goose pub.
- Barrow Hospital, located approximately half a mile to the north east of the village centre. A (largely) new and expanding housing community set in woodland on the site of the former psychiatric hospital, incorporating a terrace of original hospital cottages.

As befits a rural community there are also several farms and a scattering of more isolated homes in close proximity. The total population of the village was recorded as 349 at the last census in 2011. We estimate this will have expanded by approximately 30% since then as a result of the Barrow Hospital development.

4. The B3130 route through Barrow Gurney village has long been regarded by many as a convenient short cut, particularly by taxi companies travelling between the city and the

airport, providing a convenient and direct route from the A370 to the A38. It is also a favoured route for traffic from Wales, most of which uses the M49, M5 route to Portbury, then across country to the A38 via Barrow Gurney, to avoid Bristol altogether. (This is the shortest and most direct route from Wales, and recommended by Satnav.) It is however singularly inappropriate for large volumes of traffic. The road through the village centre is single track in a number of places as it winds between the historic houses bordering the road on both sides, and there is a 7.5ton weight limit prohibiting HGVs. A traffic management scheme was implemented to deter traffic from coming through the village immediately after the new link road between the A370 and A38 was opened in 2016, including the provision of speed humps and road narrowing on entry to the village, chicanes, road markings and signs to control the flow of vehicles, and narrow walkways alongside the road to facilitate access for villagers to the core facilities. Despite these restrictions, and due to Satnav, there is still more traffic using the road than is comfortable or safe for villagers. Hence our strong objection to further growth.

THE BA “ADDENDUM” CASE

5. It is apparent from the addendum documents submitted (Application no. 20/P/2896/ APPCON) that Bristol Airport’s case is based mainly on the assumption that air passenger numbers have been “temporarily suppressed” owing to the Covid-19 Pandemic and that they can be expected to return to similar levels within 3-4 years, reaching 10 million in 2024, 3 years later than originally projected, and 12 million in 2030, four years later than originally projected. There can clearly be no such guarantee.

6. A number of factors mitigate against such a conclusion:

- Forecasts used have emanated entirely from within the aviation industry and are speculative.
- There is a worldwide climate emergency and a desperate need to reduce carbon emissions. We are all (worldwide, but importantly as a nation) being encouraged to consider how we can reduce our own carbon footprint. Over the coming years there will need to be huge behavioural changes, partly government induced through alternative means of energy generation, promotion of changes to domestic heating systems, home insulation etc to reduce consumption of fossil fuels, and in particular in relation to transport, with a massive switch to electric, biofuel or hybrid cars and public transport.
- The aircraft industry is one of the major carbon polluters and has to play its part. However it plans to achieve this, it cannot escape the fact that the vast majority of its planes are reliant upon fossil fuels at present, and that many people will choose to reduce their air travel as an effective means of reducing their own carbon footprint. There has also been recent press speculation that financial penalties or restrictions on the number of flights permitted might be imposed on ‘frequent fliers’; again a disincentive to fly.
- Plans for electric, biofuel or perhaps hydrogen powered aircraft have yet to demonstrate with any certainty that there is any realistic prospect of an environmentally acceptable alternative to fossil fuel powered planes in the foreseeable future.
- The Covid-19 pandemic has encouraged people to think differently about their priorities, particularly in relation to the environment. Many have appreciated the change of lifestyle that the pandemic has necessitated; notably much greater home working leading to considerably less traffic on the roads, and the relative absence of aircraft noise disturbance. This, again, might lead them to reduce the number of flights they make.
- The massive growth in online communication through Zoom, Teams and other such means of holding face to face meetings remotely has brought very many to the

realisation that costly air travel for business purposes is often entirely unnecessary and can be more economically achieved.

- Many people will fear contagion while queueing at airports or sitting on tightly packed planes. Although vaccinations are already taking place, these will be rolled out over a period and are unlikely to be anywhere near complete until the summer of 2021. And even with these we still have precious little knowledge as to how effective they will be over time and how frequently we may need to be re-vaccinated. The need to wear masks and observe social distancing could be with us for a very long time.
- There will be concerns over travel insurance costs, inability to recover losses of fares or booking fees in the event of cancellations, fear of being placed in quarantine when returning from holiday, or of visiting countries where medical facilities may be either expensive or unreliable.
- Above all, none of us know how many people will have lost their jobs or how long it will take the economy to recover, with potentially very significant impact on their ability to afford foreign travel.

7. Taking these factors into account it is conceivable that air passenger numbers may take a great deal longer than the ES Addendum suggests to get back to pre-Covid-19 levels, let alone grow further. Even the Airports International Council (ACI) report referred to on P16 of the ES Addendum Main Report, which does predict a potential return to pre-Covid levels by 2024, concludes: “On the longer run, **it is predicted that the global traffic will not return to previously projected levels within the next two decades**, pointing to a potential structural change.” This suggests that 12mppa throughput at Bristol by 2030 may be very over-optimistic.

8. We consider that Bristol Airport, rather than pursue an appeal, would have been wiser to accept that there has been a dramatic fall in passenger numbers, wait to take stock of how quickly the demand for air travel - and thus the aircraft industry as a whole - would take to recover and at that stage, if necessary, re-submit a revised application that sought to find persuasive reasons to overturn the Council’s comprehensive reasons for refusal of the application.

ISSUES OF MAJOR CONCERN TO BARROW GURNEY PC

9. BA state that much of the original Environmental Statement remains valid. A major concern of BGPC throughout its consideration of the expansion proposals has been the impact of the airport’s growth on traffic passing through Barrow Gurney village, in terms of congestion, pedestrian safety, air quality and general disturbance. In normal times traffic starts passing through the village as early as 4.00am in association with the high volume of early morning flight departures. We have consistently argued that the road network across North Somerset is overloaded and that expansion proposals will lead to even more traffic using rat-runs through the many rural communities in the area to try to find quicker routes to the airport that avoid the often congested main routes. The principal reason for this is the exceptionally high percentage of people accessing the airport by private car or taxi. The proposals for expansion rely heavily on increased car parking at the airport, much of it on green belt land in its ownership, because the airport relies very heavily on the revenue generated by car parking charges. This will inevitably lead to more rat-running and even greater detrimental impact on Barrow Gurney and numerous other North Somerset villages.

10. What is needed is an alternative strategy:

- that is significantly more reliant upon access to the airport from Bristol and other centres by public transport (modal share currently 12.5%). Even at 17.5% (BA's target for future growth) this is paltry compared with most other regional airports;
- that promotes a Park and Ride facility on the M5 to cater for traffic from the SW, Wales and the Midlands, with a sustainable electric or biofuel shuttle bus link to the airport. This should be on land in the vicinity of J21 that lies outside the green belt.

11. Public transport from Bristol to the airport is at present exclusively by bus along the A38, which is largely single carriageway road. There is little scope to increase the intensity of the service as a result. The dualling of the carriageway is almost certainly a non-starter owing to the presence of the Barrow Tanks (the large reservoirs that supply water to Bristol) which abut the road on either side along approximately 1 mile of the route. All land adjoining the A38 between Bristol and the airport is green belt, meaning that any road improvements to expand its width would be likely to cause environmental harm. Any proposals to further intensify traffic movements along the A38 would be strongly opposed by Barrow Gurney PC, in particular in view of the impact upon the Naish Lane community, but also owing to the inevitable increase in the associated congestion that already occurs regularly at the peak aircraft arrival and departure times and the tailbacks that would occur on Barrow Street at its junction with the A38.

12. In our view, if the airport is to expand beyond 10mppa some form of rail link from Bristol is required in order to increase the proportion of people travelling by sustainable public transport to an acceptable level. This again would be highly unlikely to be constructed on account of the topography and the associated cost.

13. Proposals to increase the amount of parking adjacent to the motorway (and thus off site) have been opposed by the airport in the past. BGPC wrote in **strong support** of such a proposal by Mead Realisations (Application 19/P/0704/FUL) in September 2019. Whilst this application was subsequently withdrawn we understand that a new application for a similar facility to provide more than 3,000 car parking spaces on land outside the green belt has been submitted (the Heathfield Park Development). NSC has requested a detailed Environmental Statement for this. Subject to the findings of the ES Barrow Gurney PC would be likely to support such a provision in order to reduce the amount of traffic passing through the village, allowing passengers from the South-West, Wales and the Midlands to park in close proximity to the motorway and travel by sustainable bus link to the airport, rather than using the network of smaller rural roads.

14. In the past we have been critical of the data provided by the Airport's transport consultants in support of its expansion proposals. Several examples of their simplistic and erroneous assumptions are given in our response to the Additional Information to 18/P/5118/OUT submitted in November 2019. Further evidence of their inaccurate forecasting skills is exemplified on page 31 of the Transport chapter of the Addendum ES Main Report where they forecast that the proportion of HGV traffic on Barrow Street in 2030 will be 3.2% (roughly comparable with other roads in the study area). They fail to take account of the fact that there is a ban on HGV's in place on Barrow Street and a 7.5ton weight limit. Once again we find we can have no confidence in the data produced.

15. Whilst Barrow Court residents are generally less affected by the traffic coming through the village, they suffer more from aircraft noise and in particular the effects of night flights, being situated nearer to the airport atop the ridge that gives residents in the village centre rather more protection from flight paths which are predominantly routed along the south east side of the ridge.

CONCLUSION

16. In conclusion, BGPC considers that the information contained in the Addendum ES, Passenger Traffic Forecast, Economic Impact Study and Parking Demand Strategy does nothing to alter the veracity of North Somerset Council's decision to refuse planning permission for expansion of the Airport to cater for up to 12mppa for the reasons summarised below:

- Expansion beyond 10mppa would generate additional noise, traffic and off-airport car parking resulting in adverse environmental impacts on communities surrounding BA and an adverse impact on an inadequate surface access infrastructure.
- The noise and impact on air quality resulting from the proposed lifting of seasonal restrictions on night flights would have a significant impact on the health and well-being of residents in local communities.
- The scale of greenhouse gas emissions would not reduce carbon emissions, would not assist transition to a low-carbon future and would exacerbate climate change contrary to the NPPF, NSC Policy CS1 and the Climate Change Act.
- Significant expansion of car parking would constitute inappropriate development in the Green Belt, with significant environmental consequences.
- Proposed public transport provision is inadequate and would not sufficiently reduce reliance upon private car access to the airport.

17. The direct impacts on Barrow Gurney village would be largely an increased flow of traffic, with associated danger to pedestrians. Drivers continue to use the B3130 as a rat run due to GPS. They frequently exceed the 20mph speed limit, ignore the "Give Way To Oncoming Traffic" signs and override the pavements at pinch points. Whilst traffic has reduced considerably since March 2020 due to the pandemic, in normal times during morning and evening peaks drivers often resort to foul-mouthed accusations to one another and bursts of horn-blowing. There are issues of pedestrian safety, excessive fumes due to the proximity of cars to people, litter casually thrown from car windows and noise disturbance to villagers starting as early as 4.00am. Residents in the Naish Lane area suffer the effects of pollution and congestion from airport related traffic on the A38 and those in Barrow Court from aircraft noise. Growth of the Airport to 12mppa would undoubtedly exacerbate these antisocial consequences. Accordingly Barrow Gurney Parish Council wishes to uphold its **strong objection** to the proposal to increase the capacity of Bristol Airport from 10mppa throughput to 12mppa and requests that the appeal be **dismissed**.