

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

Cleeve Parish Council
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Cleeve

STATEMENT IN RELATION TO APPEAL REFERENCE: APP/DO121/W/20/3259234

1. Cleeve Parish Council has responded to the Bristol Airport planning application and to the Addendum to the Environmental Statement consultation which closed on 6 January. We retain our objections on the grounds of noise, day and night, from increased air transport movements and an increase in traffic which affects car parking in Cleeve and the Climate and Ecological Emergencies. We continue to support North Somerset Council in their five reasons for refusal. We are a member of the Parish councils Airport Association who support our concerns.

2. Context of the Parish

- 2.1. Cleeve Parish is situated south west of the Airport with the A370 running through the village. It is in the direct line of the airport runway and about 3 km distant from the runway. The motorway J21 links with the A370 which carries significant car travel to and from the Airport. The dominant noise in our village is from aircraft movements. Cleeve falls into several noise contours, 60, 57, and 54 dBL. Cleeve is a rural village which is in the green belt and sits between the two urban centres of
- 2.2. Weston super Mare and Bristol. It falls into the Forest of Avon catchment area. The village lies at 30m above sea level below a steep limestone ridge. The village contains two wooded combes, Cleeve Combe and Goblin Combe, and also King's Wood, thus, almost half the parish is covered by woodland. King's Wood and Goblin Combe are both SSSI and King's Wood represents one of the largest ancient woodlands in North Somerset. This woodland supports the protected species of Greater Horseshoe Bats and Dormice. The roost of the bats is in a Special Area of Conservation (SAC). There is also a locally significant heronry in the parish. There are multiple footpaths and these have been intensely used during the pandemic by local residents and people from Bristol. There is a famous view point from Goblin Combe woods known as 'the Toot' which is part of an ancient bronze age settlement.
- 2.3. Note that Goblin Combe SSSI is classified as 'favourable condition' by Natural England. However, King's Wood and Urchin Wood SSSI are classified as both 'unfavourable recovering' and in some areas 'unfavourable declining'. Any increase in air pollution, activity or noise has a potential to accelerate the decline of these delicate areas, which have been awarded the highest level of protection
- 2.4. There are 364 dwellings in Cleeve and 727 residents shown on the electoral roll. There are a number of 17th and 18th century houses which are listed and a grade two listed church.
- 2.5. Although Cleeve is a small rural village, we play an important part in protecting the local biodiversity and the woodlands. CPC takes its responsibility seriously and fights to maintain or improve the integrity and the attractiveness of its woodlands and biodiversity. These are valued highly by local people and those further away and are threatened by increases in aircraft noise, worsening air quality and loss of foraging for our rare and protected bats. The footpaths have become well known in a wider area, offering benefits to health and well-being. The woodlands provide a wide range of ecosystem services. These include provisioning (fuel and timber), supporting (e.g. soil

formation), regulating (e.g. climate, flood hazard, noise, and airquality regulation), and cultural (e.g. cultural heritage, amenity, health, recreation).

The growth of Bristol Airport to date has caused considerable impacts to the village which we shall now describe:

3. Noise

- 3.1. The parish is situated under the flight path and close to the western end of the runway which cause ground and air noise, day and night. Residents' sleep is often disturbed, they are unable to open their windows in summer months and often conversations with people have to be halted when an aeroplane passes overhead. Gardens can be no longer enjoyed with any tranquillity.
- 3.2. The winds are predominantly from the South West which means approximately 70% of all flights depart from runway 27 and fly over the village. The airport commences at 06.00 hrs with a vengeance as multiple aircraft depart at that time. There is usually a flight every three minutes in the summer months between 06.00 hrs and 07.00 hrs. The noise is considerable, and residents are woken on a regular basis. But since 2016 aircraft have been departing earlier than 06.00 in the summer months. There are now flights from approximately 04.00 hrs. These aircraft movements again disturb residents. When these flights commenced in 2016, residents complained to the Airport and the issue was discussed at the Airport Consultative Committee but to no avail. Flights before 06.00 have increased yearly since 2016. Cleve Parish Council (CPC) have a representative who sits on the Airport Consultative Committee.
- 3.3. CPC is not an expert on the modelling of noise but we do know and accept that residents do not hear an average decibel level of noise but a noise event. We recognise that the frequency of the noise events is what creates an annoyance. The frequency of aircraft movements at Bristol Airport has continued to grow and under the 12 mppa application this will take away any tranquillity left to residents.
- 3.4. The timing and frequency of movements during growth to 10 mppa and subsequently have not been considered in the Airport Health Impact Assessment nor within the Environmental Statements. We request that the frequency and timing of aircraft movements are examined.
- 3.5. CPC fully concur with the Independent Commission on Civil Aviation Noise (ICCAN) in their review of aviation noise metrics and measurement which was published in July 2020. ICCAN commented that *'we acknowledge and agree that people do not experience noise as an average, and therefore reliance entirely on LAeq does nothing to aid public understanding, let alone trust, in the data being published.'*
- 3.6. For an affected community living under the flight-path, disturbance and annoyance will increase according to the number of flights passing overhead coupled with the associated shortening of the respite period between flights. The precise level of noise generated by each aircraft is almost immaterial. An assessment that is based on an average decibel level over time does not reflect the form of disturbance that we experience. Whilst it may be the case that aircraft are getting less noisy this will do nothing to reduce the level of annoyance.
- 3.7. The use of average noise levels is clearly flawed. The calculation is insensitive to the number of aircraft noise events. A doubling of aircraft movements, say, would lead only to a relatively marginal increase in the average decibel level. If that doubling of movements was coupled with a small reduction in the noise emitted by each aircraft,

then the average noise level could in fact remain the same. For local residents on the ground however this is nonsensical. The level of disturbance and annoyance would be hugely increased by a doubling of flights. The fact that each flight was fractionally less noisy would be immaterial.

- 3.8.** Bristol Airport not only has commercial air transport movements, it also has private jets, general aviation and helicopter movements which are equally disturbing and noisy. The Passenger Transport Forecasts of November 2020 state in Appendix B: Core Case Scenarios that with and without development there will be 600 positioning movements and 10,040 'other movements' (private jets and general aviation, note that helicopter movements are excluded from the table). We request that these air transport movements are limited to 10,000 atm's per annum in the interests of residents' health and well-being. General aviation from the flying club can be particularly annoying as these movements circle round the airport for a considerable period of time on the same circuits delivering a persistent, irritating buzz on local residents. Helicopter training is also carried out with similar impacts. This training is not just for the local area but also for other airports, such as the Cotswold Airport.

4. Night Noise

- 4.1.** The summer months will see an increase in night flights as the Airport still wishes to change the condition from the one at 10 mppa which retained a winter limit of 1,000 atms and summer limit of 3,000 atms between 23.30 - 06.00 hrs and to replace this with a rolling annual total. This delivers an average of 11 flights per night in the summer months but it simply doesn't work like that as there are more flights at the weekends than on Tuesdays or Wednesdays. There could be 22 or more at peak times which equates to one every 15 minutes. If there are an additional 4 flights per night, as suggested by the Environmental Statement, there could easily be 30 flights per nights at the weekend as the 4 additional movements are not evenly distributed.
- 4.2.** CPC view the change of condition as a backward step in terms of a balanced approach to noise. We strongly object to the change of the night noise condition and request a reduction in night flights in the summer months. This would be in-line with the increasing evidence shown on the impacts of noise on health and well-being which the PCAA have highlighted in their submissions. **CPC strongly object to any change in the condition on night noise.**

5. Ground/Background Noise

- 5.1.** Ground/background noise is received in Cleeve when Runway 09 is in operation. Problems with ground noise commenced with the delivery of the Western Apron under the planning consent of 10 mppa. Residents can now suffer from ground noise at the same time as noise from aircraft approaching the Airport. This will become worse under the future proposals.
- 5.2.** Note that residents have no respite from noise at all as there is only one runway and it is always in operation.

6. Noise Insulation

- 6.1.** Noise insulation is offered to residents in Cleeve in the 57dBL contour. CPC do not believe that the noise insulating scheme is generous. Many house owners have to

contribute substantial finance on top of the noise grant in order to insulate the majority of their home. No compensation is given for the intrusion of noise into their gardens and the lack of tranquillity outside. CPC note that the PCAA has requested a cost/benefit analysis of noise against the benefits of expansion. To date, this has not been provided. Note, also, that residents bear significant additional financial penalty as the value of their houses decreases when airport expansion is permitted.

7. Air quality impacts from aircraft

- 7.1.** Aircraft engines generally combust fuel efficiently but the Aviation Environment Federation states that ground-level emissions during take-off, climb and landing have a huge impact on ambient air quality.
- 7.2.** The 2019 European Aviation Environmental Report says that a two-engine aircraft carrying 150 passengers and travelling for one-hour releases 30kg of nitrogen oxide (NO_x) into the atmosphere.
- 7.3.** In 2015, NO_x released from aircraft accounted for 14% of all EU transport emissions.
- 7.4.** Long-term exposure to NO_x can decrease lung function and increase the risk of respiratory conditions. Exposure to NO₂ can lead to an increased likelihood of respiratory problems and the development of asthma.
- 7.5.** A major pollutant that is released from aviation is the smaller, ultra-fine particles (UFP) which have been linked to many deadly diseases from heart disease, chronic lung disease and brain cancer. Further, there is now evidence to show that UFP have a direct link to dementia as particles have been found in the brains of dementia sufferers. This has been well documented in the Lancet and BMJ.

8. Traffic

- 8.1.** As part of growth to 10 mppa, car parking for the Airport has become a problem in Cleeve. This came into play with the commencement of the bus service from Weston super Mare to the Airport. The A370 is a main route to the Airport from the M5 Junction 21. There are many car movements both to and from the Airport that pass through the village. The bus service from Weston to the Airport stops in Cleeve. Air passengers now park their cars for free in Cleeve on small roads such as Millier Road causing considerable distress to residents. We believe that under growth to 12 mppa car parking will spread beyond Millier Road to other roads in the vicinity of the bus stop.
- 8.2.** Traffic will inevitably increase as the airport grows to 10 mppa from a level of approximately 9 mppa in 2019. There will then be a further increase in traffic movements to 12 mppa. Currently the modal split for public transport is 12.5%. The modal split for public transport at 12 mppa is very ambitiously set at 17.5%. But this still means that 82.5% of all journeys to and from the Airport will be by car at 12 mppa. The impact to residents will be immense and will lead to increased use of rural roads to access the Airport.
- 8.3.** The Airport includes an increase in electric vehicles in their calculations to infer a reduced amount of air pollution from cars visiting the airport. But no one knows the time it will take for electric vehicles to become the norm. It is expected that only half the vehicles on the roads at 2030 will be electric which is the moment when the Airport is predicted to reach 12 mppa under the Core Case Scenario. A substantial majority of

vehicles on the road will still be fossil fuelled. Although air quality will remain within legal limits, documents state that it will worsen. CPC take the view that we should at least maintain the air quality we have.

9. The delivery of Multi Storey Car Park 2

9.1. The delivery of Multi Storey Car Park 2 is of the utmost importance to CPC. The home of the roost for the bats is in King's Wood, in our parish. These bats forage on the green belt land on the South side which is to be turned into the Silver Zone Car Park. CPC notes that the Addendum to the Environmental Statement and new documents do not state when the MSCP 2 will be delivered. Yet they infer that the extension to Silver Zone Phase 1 will be released immediately for permanent car parking in 2022. Silver Zone Car Parking Phase 2 is for 2,700 car spaces which will then be released in 2025. CPC requests that the MSCP 2 should be delivered for 10 mppa as the planning consent of 2011 stated. We note that, under the Core Growth Case, growth to 10 mppa is predicted to be in 2024 and under the Faster Growth Scenario is predicted to be in 2022. We would expect the delivery to be conditioned in line with the forecasts given. Green belt land which is where the bats forage should not be sacrificed to car parking. The strategy for car parking is one of low cost (using open land rather than MSCPs) which is unsustainable and does not support the transition to a low carbon economy as it encourages people to fly and to drive to the airport.

9.2. CPC note that no bat survey has been undertaken on the replacement land which is to provide foraging for the bats. This should assess whether a) it is suitable for bats to forage and b) there is sufficient foraging to support the bat populations from Kings Wood whilst continuing to provide foraging from the Brockley Roost. Under the Precautionary Principle, CPC believe that it must be shown that the replacement land is adequate and that no harm will come to a protected species. Likewise, Birds and bats can be sensitive to noise and other visual disturbances from changes in the frequency and timing of air traffic movements. The buffer used by natural England for disturbance effects to birds and bats is 11 km. Thus, the potential impacts via receptor pathways on SAC designated for highly mobile bat species (which can habitually travel distances greater than 11km) need to be considered. If looking in a 11km radius from Bristol Airport the foraging impact may have adverse effects on SSSIs as far as the Cheddar Complex SSSI to the south and Weston Big Wood SSSI in Portishead to the North.

10. Climate Change and the Ecological Emergency

10.1. CPC has, like many district councils and local authorities throughout the country (including North Somerset Council), recognised and declared a climate and ecological emergency, as the two are interconnected. The Airport's proposals show an increase in aviation emissions which runs contrary to the emergencies we face.

10.2. The Airport suggests two scenarios and bases its work on the 'planning assumption' of national emissions of 37.5MtCO₂ while running a sensitivity of around 30MtCO₂ based on the Committee on Climate Change's (CCC) net zero report. In September 2019 the Committee on Climate Change wrote to the Secretary of State advising that the Government should be planning for net zero emissions. Bristol Airport is not taking account of emerging policy and continues to base aviation emissions on policy that needs updating. Bristol Airport is relying on the Aviation Strategy White

Paper based on the 2018 Green Paper which was written before the Net Zero target became law. Updated Government policy is expected in early 2021.

- 10.3.** The Sixth Carbon Budget, the UK's path to Net Zero, has just been published. The Airport's slower growth case will fall into the period of the sixth carbon budget from 2033. CPC requests that the aviation emissions section takes account of the carbon budget which advises that international emissions should be included.
- 10.4.** The CCC advice is clear in its report - that the Government needs to stop airport expansion. Their analysis shows that current and planned UK airport expansions could increase aviation CO2 emissions by nearly 9 MtCO2 a year in 2050 compared with a situation with no expansion.
- 10.5.** The Airport continues to fail to put its own emissions in the context of other airports that are expanding such as Stansted, Luton and Gatwick.
- 10.6.** Aviation growth is not compatible with a low carbon economy and the net zero target.

11. Conclusion

- 11.1.** The original Environmental Statement and the Addendum to the Environmental Statement show that the Airport intends to grow – a strategy of 'business as usual' - although the pace differs under different scenarios. This intention to expand will increase the negative impacts already received from airport operations on Cleeve. The Airport finds that all impacts from growth to 12 mppa in effect are 'not significant' which is contrary to the views of Cleeve Parish Council. We view them as 'highly significant' and believe that the Appeal should be refused.
 - 11.2.** We are aware of a new Status 6 application for parking development at Heathfield, Hewish which would take traffic off the A370 but, as we have yet to see a formal application, we cannot agree or disagree with this at this stage.
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