

## **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**

Councillor Sarah Warren

**Proof of Evidence for Inquiry into Bristol Airport's Proposed Expansion, Planning Application Number 20/P/2896/APPCON**

**Councillor Sarah Warren, Bath & North East Somerset Council, June 2021**

1 I was elected as Councillor for Bathavon North Ward, and appointed as Cabinet Member for Climate Emergency & Neighbourhood Services (job share) for Bath & North East Somerset council in May 2019. In May 2021, I was appointed as Deputy Leader with Cabinet Responsibility for Climate and Sustainable Travel. My academic qualifications include an MSc in Sustainability and Adaptation Planning, awarded in 2018 by the University of East London (course delivered at the Centre for Alternative Technology, Wales).

2 The following topics will be addressed:

- The reasons why airport expansion is incompatible with a declaration of climate emergency, and forms a material consideration in planning, being incompatible with the National Planning Policy Framework paragraphs 7, 11 and 148.
- Whether the economic projections in the airport's business case are reasonable in a context not only of a climate emergency, but also of the pandemic.
- The impact of airport traffic on the villages of Bath and North East Somerset..

3 Climate emergency

In early 2019, Bath & North East Somerset Council (B&NES) resolved, like our neighbour North Somerset, to declare a Climate Emergency in response both to the latest science from the Intergovernmental Panel on Climate Change (IPCC)<sup>1</sup> outlining the dire impacts of surpassing 1.5°C of global heating, and to the clear demand from our community for moral leadership. As part of our climate emergency motion, we pledged to provide the leadership to enable Bath & North East Somerset to become carbon neutral by 2030 (in line with North Somerset's aim for carbon neutrality expressed in its Climate Emergency Strategy), and we also resolved to oppose the expansion of Bristol Airport. We are fully committed to our pledge, which we contend is a material consideration that should be given great weight in planning.

At the centre of the National Planning Policy Framework (NPPF) is a "presumption in favour of sustainable development" (paragraph 11) – a concept summarised (paragraph 7) as "meeting the needs of the present without compromising the needs of future generations to meet their own needs." The framework also states that, "The planning system should support the transition to a low carbon future in a changing climate...." [and] "shape places in ways that contribute to radical reductions in greenhouse gas emissions...." (paragraph 148).

Carbon emissions associated with the expansion of Bristol Airport are projected at up to 50ktCO<sub>2</sub>e/yr in 2030 (some 4% of North Somerset's total 2017 carbon emissions, from DBEIS data<sup>2</sup>). This is in the context of a wider picture of

proposed airport expansion around the UK, which renders the proposed increased contribution to the UK's carbon budget from aviation a highly significant and increasing proportion of total emissions, as the rest of the economy is projected to make cuts. The New Economics Foundation (NEF)<sup>3</sup> notes additionally that this figure considers CO<sub>2</sub> emissions only, excluding other pollutants which significantly increase aviation's total climate impact, including water vapour, nitrogen oxides and aerosols. It also considers departures only, which is conservative considering that 83% of Bristol's passengers live in the UK. NEF states that decision makers have not been presented with climate impact estimates representative of the true likely range of impacts, in relation to Bristol Airport's expansion plans, with climate impact figures claimed by the applicant representing less than the minimum, and only 16% of the maximum, modelled climate impact of the expansion.

In December 2020, the Committee on Climate Change (CCC) issued its Sixth Carbon Budget report<sup>4</sup>, recommending that we should newly take into account emissions from aviation, and that the UK should make a clear commitment to act on these, if the 1.5°C global temperature increase goal of the Paris Agreement is to be met. The report stated, "Matching strong ambition with action is vital for the UK's credibility, with business and with the international community," and advised that the UK should report annual best estimates of the impacts of non-CO<sub>2</sub> effects from air travel, such as contrails, in addition to direct CO<sub>2</sub> emissions, as "they are a significant part of aviation's impact on the climate" (p 374).

Aviation is identified by the CCC for a reduction in emissions of 7% by 2035, to support the country's trajectory to zero carbon by 2050, and it is assumed that the expansion in air travel they allow for, occurs without any net increase in UK airport capacity. The report clarifies that any UK airport expansion that does occur "would require capacity restrictions elsewhere in the UK (i.e. effectively a reallocation of airport capacity)." In December 2020, the Supreme Court overturned a previous ruling against London Heathrow's proposed third runway, which alone could result in an additional 16 million long haul passenger seats per year. The approval of Leeds Bradford Airport's expansion last week will add a further 3 million passenger journeys, and a public inquiry is ongoing examining Stansted's plans to add capacity for 15 million flights. The Secretary of State needs to step back from individual requests for expansion and look at the bigger picture of UK airport capacity in the light of the CCC report, during which time, it would be logical to suggest there should be a moratorium on all UK airport expansion.

This application also sets store in new technology which is unproven at scale, such as hydrogen fuelled planes and underground carbon capture, to mitigate the additional aircraft mileage predicted by 2050. However, the timelines for development of the proposed technologies are speculative, and the timescale of 2050 is later than the IPCC's timeline for net zero in order to ensure dangerous heating beyond 1.5°C is avoided. The application also relies on offsetting using the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) methodology, which the CCC report states, "is not currently compatible with the Paris Agreement."

The UK Government pledged on 12<sup>th</sup> December 2020 to cut the nation's carbon emissions by 68% by 2030, a Nationally Determined Contribution under the Paris

Agreement. The CCC report is clear that this target cannot be achieved whilst aviation continues to expand in an uncontrolled manner, and the UK risks embarrassment as hosts of the forthcoming COP26 conference in Glasgow in November 2021.

#### The Economic Case

Whilst the NPPF's definition of sustainable development balances economic and environmental objectives, B&NES contends that the climate emergency should be given greater weight than the economic benefits outlined in this application because any economic benefits of this development must be seen in relation to the overall economic costs of global heating, which are very substantial. The OECD states<sup>5</sup>, "Climate change is an existential threat, posing severe risks to individuals, society and to the economy, as exemplified by the increasing frequency and intensity of extreme weather events. Economic losses incurred from weather-related disasters amounted to an estimated USD 337 billion in 2017, and these numbers are expected to grow substantially in the near future."

The economic case for Bristol Airport's expansion makes a passenger growth forecast that current capacity of 10 million passengers per annum will be reached by 2024, increasing by means of this planning application to 12 million by 2030, when the airport is forecast to support some 4000 local jobs. However, in light of the huge changes to our lives brought about by the pandemic, along with ever more concerning forecasts of the impact of global heating, these predictions must be regarded as highly speculative. It should also be noted that a recent report<sup>6</sup> by the Institute for Public Policy Research highlighted the many potential alternative areas for development of the economy which could aid economic recovery following the pandemic, whilst also helping to meet the UK's climate and nature goals (p71).

#### Surface transport in Bath & North East Somerset

In addition to climate emergency considerations, I must also mention the impact of airport traffic on the villages of Bath and North East Somerset. Bristol is the largest UK airport without rail or light rail. Its mode share of public transport is just 13% and falling, the lowest of all UK airports of similar or larger size. Most employees travel by car, as there are few towns nearby. Most passengers travel by car or taxi. The near total absence of public transport across the Chew Valley from the south and east means that the communities of Chew Magna, Pensford, Chelwood, and Chew Stoke are blighted by airport traffic, shining headlights into bedrooms at all times of the night, and making children's journeys to school dangerous.

An additional 4850 parking spaces are proposed as part of this application, meaning uncontrolled growth in traffic, with corresponding impact on the highway network. The provision of these spaces will, of course, undermine any public transport improvements that may be planned.

An airport bus route passes through Corston, Keynsham, and Newbridge, Bath, and locals have to contend with cars abandoned for weeks by holiday-makers. In Chew Valley villages, closer to the airport, cars await arrivals with idling engines due to the exorbitant charges for airport pick up and drop off parking. Night flights are planned to increase, disturbing sleep along flight paths bringing planes low

over B&NES, above the villages of Pensford, Corston, Queen Charlton, Chewton Keynsham, Compton Dando, Burnett – and even residents of Bath, Radstock, Wellow and Keynsham have reported being woken by aircraft.

#### 4 Conclusions

On balance, it is very clear that the adverse environmental impacts of the proposed development outweigh its benefits. Taking all new and developing evidence into account, it is even more relevant now, than when B&NES council voted to oppose Bristol Airport's expansion in March 2019, that this application is rejected.

It is clear that the climate emergency impacts of the expansion have been underestimated in the application, and must be given more weight in planning than the claimed economic benefits, which are best speculative, and are also outweighed by the enormous economic costs of the climate impacts.

I would agree with the conclusions of NEF<sup>3</sup> and the CCC<sup>4</sup> that the currently active airport planning applications should be determined at national level, given the CCC's recommendation there should be no net expansion of airport capacity, and that a more robust and precautionary evidence base on climate change issues should be developed.

Additionally, the lack of mass transit, or a satisfactory surface transport plan for travellers from the east, makes the highways impact on villages in B&NES unacceptable.

#### References

- 1 Intergovernmental Panel on Climate Change (IPCC), Global Warming of 1.5°C, October 2018. [https://report.ipcc.ch/sr15/pdf/sr15\\_spm\\_final.pdf](https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf) (Accessed 2/1/2021). CD9.58
- 2 Department for Business, Energy and Industrial Strategy (DBEIS), 2005-2017 UK local and regional CO<sub>2</sub> emissions data tables, 27 June 2019 <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017> (Accessed 2/1/2021). CD9.116
- 3 New Economics Foundation (NEF), Turbulence Expected: The Climate Cost of Airport Expansion, 21 May 2021 <https://neweconomics.org/2021/05/turbulence-expected> (Accessed 23/5/21). CD9.85
- 4 Committee on Climate Change (CCC), 6<sup>th</sup> Carbon Budget, 9 Dec 2020 <https://www.theccc.org.uk/publication/sixth-carbon-budget/> (Accessed 2/1/2021). CD9.7
- 5 Organisation for Economic Cooperation and Development (OECD), Policy Responses to Coronavirus (Covid-19), 26 June 2020 <http://www.oecd.org/coronavirus/policy-responses/covid-19-and-the-low-carbon-transition-impacts-and-possible-policy-responses-749738fc/> (Accessed 2/1/2021). CD9.117

- 6 Institute for Public Policy Research (IPPR) Environmental Justice Commission, Faster, Further, Fairer, Putting People at the Heart of Tackling the Climate and Nature Emergency, May 2020  
<https://www.ippr.org/files/2020-05/faster-further-fairer-ejc-interim-may20.pdf> (Accessed 2/1/2021).CD9.118