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Our Ref: 19/00008/CONSLT
Your Ref: **18/P/5118/OUT**

Neil Underhay
Development & Environment
North Somerset Council
Town Hall
Walliscote Grove
Weston-Super-Mare
BS23 1UJ

Dear Mr Underhay

Re. Outline Planning Application involving Bristol Airport Expansion (to 12 million terminal passengers per annum)

Thank you for your letter dated 20 December 2018 seeking this Council's views regarding the above outline planning application. This letter constitutes Bath and North East Somerset Council's **HOLDING OBJECTION** to the application.

Bath and North East Somerset Council (B&NES) has considerable interest in this planning application, and the potential impact of the proposed scheme on the local highway network. In the past, the severe congestion issues that have been experienced on the A38 have resulted in traffic being diverted onto lower grade rural routes. This has affected communities within B&NES, and in particular the village of Chew Magna has witnessed an access in traffic volumes on the B3130 route. This response considers transport issues that could have a potential impact on the operation and safety of the highway within the B&NES authority boundary area. A comprehensive review of traffic analysis that solely affects other highway authority areas has not been undertaken.

This is an initial response to the planning application. Further work is being undertaken by this authority to review the potential traffic impact on the roads located within the B&NES Council area, and a comprehensive response will be provided in due course. If a planning decision has to be made in the immediate future, it is requested that B&NES Council is notified in advance so that a final response can be provided.

B&NES Council has an interest in the work undertaken as part of the Transport Assessment, Parking Strategy and also the Environmental Impact Assessment. These documents are reviewed in the following sections.

Transport Assessment

Comments relating to the Transport Assessment and requests for further clarifications are provided below.

The future passenger number profiles for the 10mppa and 12mppa scenarios have been provided by Bristol Airport for the purposes of the analysis. Table 8.1 of the Transport Assessment presents the growth for each month across the year, and this shows a growth rate for each month of 20% from 2012 to 2026. It is questioned whether this consistent growth rate across the months of the year is realistic and it is questioned whether this is based on historic growth rates. It is recommended that this is compared against historic trends to ensure that the monthly growth impacts are correct and reflect industry demands. This comparison should also be presented for the weekday trends to ensure that the peak is correctly identified. The flight information that has been used to determine the hourly flows presented in Table 8.12 should also be presented.

Table 8.21 of the Transport Assessment presents the daily profile for the increase in public transport users in the future scenarios. It should be clarified whether this is based on historic daily trends of public transport users by hour or whether a flat growth has been assumed across the day. It is assumed that there are some periods of the day which have a lower level of public transport use, and this should be considered within the assessment approach.

Having reviewed the traffic impact analysis there is a general concern that the use of an “average” weekday to assess the operation of the local highway network has the potential to underestimate the traffic flows that occur on a Monday, Thursday, Friday and at the weekend. The earlier scoping note showed that flows on a Tuesday and Wednesday were significantly lower, and this would suppress the baseline and development flows that were used for the assessment. Table 8.22 of the Transport Assessment presents the proposed increase in daily vehicle trips. It is recommended that the applicant clarifies the difference between the flows used within the assessment and those experienced at the actual peaks that occur through the week.

The potential impact of the scheme at the weekend is not presented within the document. It should be clarified how the peak period weekend traffic flows compare with the peak weekday period included within the assessment approach.

Further work is being undertaken to consider the actual impact of traffic associated with Bristol Airport travelling along the B3130 within the B&NES authority area. An update will be provided as soon as further information is available. However, to address the above concerns that the proposed expansion will exacerbate existing traffic problems, it is requested that the applicant responds to the queries raised as part of this review.

Parking Strategy

The submitted Parking Strategy confirms that there will be a total of 18,400 parking spaces at the Airport by 2021 (as permitted by previous planning applications, with the current level being 16,700 spaces), and that there would be a need for these levels to be increased by an additional 4,600 spaces in the 12mppa scenario if the current modal share continued. This equates to an increase of 25.5% above the permitted parking levels. The level of increase can be reduced to 3,900 spaces if the modal share of public transport was increase to 15% of the total movements.

It is noted that the proposed parking solution for the application actually promotes a total of 4,850 spaces as part of the scheme and this would equate to an overall increase of 26.3% above the permitted parking levels. This level of increase would appear to be unconstrained and well above the 20% increase in passenger numbers sought as part of the application. This level of increase does not reflect the need to ensure that public transport connections to the Airport are adequately promoted. This also suggests that the predicted traffic flows, as included within the Transport Assessment, could be exceeded in the development scenario.

It is requested that measures are implemented to ensure that parking levels at the Airport are constrained to appropriate levels and that the future provision reflects more ambitious public transport initiatives. The highway authority would strongly support measures to enhance such provision, including from origins within the B&NES authority area.

Environmental Impact Assessment (EIA)

It is noted that the EIA Traffic and Transport study area includes the West Lane and Barrow Lane corridors and traffic on these links would continue along the B3130 with the B&NES authority area.

The traffic impact work included within the EIA has been based on Annual Average Weekday 18h (AAWT 18h) traffic flows. Given that the Airport has peak impacts at other times, such as early in the morning and at weekends, it is unclear why Annual Average Daily Traffic (AADT) traffic flows have not been used as the basis of the assessment. It is also noted that the application proposes an alteration to the limitation of night flying movements, and this will increase traffic flows throughout night time periods. It is recommended that a sensitivity test is undertaken to determine the scale of impact that the proposed development would generate in an AADT assessment scenario.

Table 6.10 presents the traffic flows in the development scenario. It is not entirely clear how these flows have been generated or distributed across the local highway network. Clarification as to how the AAWT 18h flows have been generated is requested.

It is requested that the applicant responds to the initial queries raised in this consultation response. The B&NES highway authority is currently undertaking specific analysis that will examine the potential impact on the B3130 corridor and a further response will be provided in due course.

Economic Development Matters

The economic benefits to the B&NES area, as the closest neighbouring unitary authority (UA) have not been sufficiently evidenced. Broad statements are made but there is a lack of substance as to how they will be achieved and how the specific aims of the Joint Spatial Plan and the Local Plan Options Consultation will be supported.

The specific benefits to the wider area should be more sharply outlined and the activities and routes which have been targeted to boost the most prominent and target sectors within both B&NES and the West of England LEP area should be explicitly outlined. The Economic Impact Assessment (EIA) report outlines that *'In 2017, the airport handled a record 8.2 million passengers, of which around 1.3 million were estimated to be flying on business.'* However, there is little within the report to outline how the expansion looks to address this imbalance, if

indeed it does. To move the needle from having only around 15% of flights for business to a great percentage would positively benefit the business community within B&NES as suggesting of a higher rate of international business collaboration and exporting. It would be beneficial for Bristol Airport to outline what their ambitions are within this measure and what activities they propose to influence it.

The EIA makes reference to the key business sectors identified within the West of England Local Enterprise Partnership Strategic Economic Plan:

- advanced engineering & aerospace;
- creative & digital media;
- low carbon;
- high tech industries;
- professional services.

However the EIA doesn't address how the airports expansion plans will support the growth of these industries. There is not a plan outlined as to how these sectors will be targeted or how growth of the airport will contribute positively to them. Again the EIA notes the November 2017 JSP Publication Document identifies Bristol Airport as a key strategic infrastructure employment location (Policy 4). It recognises the employment growth potential of Bristol Airport and in this regard, the supporting text to Policy 4 states: "*Growth at Bristol Airport has the potential to create a range of new employment opportunities*". However, the specifics of the employment opportunities and how precisely these will be linked to B&NES residents is not addressed.

Tourism is a key sector to B&NES and within the Local Plan Options Consultation it outlines the key challenge to 'Maintain the city as an important visitor destination and manage the environmental impacts of tourism.' Within the EIA it notes the strength of the area in terms of tourism but does not specifically mention how the airports expansion will positively benefit B&NES, despite the direct link to Bath City Centre from the airport. No measures or initiatives are outlined which would positively support the tourism sector within both Bath and B&NES as a whole is mentioned.

Within the EIA figure 4 is presented as an Economic Impact Framework and Relationships is displayed which sets out the 'Wider Economic Benefits of Competition, Tourism, labour, trade and inward investment' which the airport brings to the area. However, the extent to which the airport expansion positively benefits trade and inward investment is not addressed. Details as to how it will benefit of the economy each of these elements specifically should be clearly outlined and substantiated.

In relation to productivity the EIA notes that, "*the connectivity provided by Bristol Airport enables the flow of trade, investment, people and knowledge that are central to globally successful regions*". However, the report does not outline how the airport expansion will support this in terms of business passengers or increasing the ratio of leisure / business passengers. It would be useful to see these activities outlined, including the relative value to the surrounding UAs specifically. Also, it would be beneficial for more information as to how the expansion will benefit the area in terms of foreign direct investment (FDI). This is alluded to but not substantiated.

The sectoral breakdown of business passengers is outlined within the EIA however there is no exploration as to how the expansion will specifically benefit these sectors. Specific activities, routes or sector specific promotion is not explored. To fulfil the levels of growth within the planned expansion there will need to be a high level of recruitment from the local economy. As one of the airports nearest UA it is likely that the expanded workforce will be drawn from B&NES residents. Therefore, it is important to see the level and types of employment opportunities which will be afforded to them.

In section 4 of the EIA the impact of inbound tourism on GVA and employment is outlined. As the closest UA to the airport it would be useful to see the projected impact of expansion on B&NES. The report outlines that the likely areas for employment will be Weston super Mare and Bristol. No mention is made, other than on Figure 4.3: Distribution of On-site Employees at Bristol Airport map, of the employment contribution which is expected to come from B&NES residents. More granularity in terms of the number and types of employment which is expected from the expansion including training opportunities would be beneficial to assess the relative impacts which the expansion would bring to B&NES.

Within the EIA it references that were Bristol Airport not in operation then these business flights would not be made. It outlines that this is based on a 'model of passenger behaviour'. It would be useful for this model to be provided and how it is cross referenced without data sources outlined. The EIA outlines the level of construction jobs and economic impact this will bring to the immediate and surrounding areas. More detail is needed as to how these opportunities will benefit local (B&NES) residents and businesses as well as the local supply chain.

Much more evidence is needed in terms of granularity of affects to North Somerset, the wider area and B&NES specifically. Given that B&NES is one of the closest UAs more information as to how key business sectors will be targeted and how tourism within the Bath and the wider B&NES area will be supported and targeted directly. Activities and policy as to how an increase in the proportion of business vs leisure flights will be achieved is not presented. We would request that North Somerset Council as the planning authority request this information is provided within the next iteration of Bristol Airport's application.

Yours sincerely

Chris Gomm
Principal Planning Officer