

BRISTOL AIRPORT EXPANSION APPLICATION: 18/P/5118/OUT

Observations by Churchill and Langford Residents Action Group: (we recommend refusal)

Background

The application and its proposals are in anticipation of an increase in passenger movements to 12 million passengers per annum (12mppa).

We should recall that this proposal exists within unprecedented constraints as we become rapidly more appreciative of our fragile environment, of the impact of CO₂ and other atmospheric pollutants upon it and of the finite character of many of the resources available to us. Progressive decarbonisation is crucial and yet there is (for aircraft) no evident zero carbon alternative to fossil fuel.

Expansion constraints

Overall the annual trend since 2000 is approx. $(8.2m-2.2m)/17y = 0.35$ million ppa. The Airport's projected *20mppa in 2040s* is very approximately in line with a linear extrapolation of the present trend over almost two decades. We suggest, however, (see also below) that this projection is unrealistic or at least highly optimistic. See also the BIA Masterplan Assessment for 2006-2030 and dated Nov 2006, and also the Greater Bristol Strategic Transport Study (2006) wherein (Figure 2.3) projected growth rate was about 0.3mppa.

The Airport proposals pose some major difficulties for the communities living in this sub-region.

It poses two principal problems for these local communities:

- 1) Poor surface connections for surface transport and consequent road-congestion.
- 2) Substantial consequential hazards and disbenefits posed for the environment.

The airport is very poorly connected by surface transport It is in fact the least well-served by public transport of the nine largest UK airports of which it is ninth in terms of passenger throughput. It also poses major local environmental problems, partly by its impact on local communities – particularly those immediately under the flight path, and partly because it has a potentially very serious deleterious effect on the local natural environment which (uniquely for a major UK airport) contains sensitive ecosystems of both national and international importance. (For a current digest see the Bristol Airport monitoring report for the year 2017 (actually called by publication date - 2018) This also contains much useful data over more than a decade.)

We should note that the Airport hinterland is increasingly to the North and not further into the SW peninsula: see for example the Airport Monitoring Report 2018 – for year 2017. This is the reason why improved access to Bristol (and hence to points beyond) is so important within the future plans elaborated by the Airport, North Somerset and the wider West of England Partnership.

We should note that the planning conditions set in 2011 for current expansion towards 10million ppa have yet to be met (see North Somerset Core Strategy CS23). Currently the Airport meets neither the surface access nor the environmental mitigation requirements and the objectives set out therein. We should also note carefully two things:

- i)that there is no proposal that the proportion of access by public transport should increase and

ii) that if public transport access were to be increased, but only by present means along congested roads, then such access would become increasingly unreliable and consequently would itself become operationally very problematic.

We have offered an alternative (Maglev) proposal* for a modern electromagnetic public transport option which would provide an unobtrusive, highly energy-efficient solution to this problem.

Car Parking provision at the airport is already inadequate and this serious problem must be resolved **before** expansion, even to 10mppa, can be permitted. The CS23 provisions themselves have yet to be met. Expansion of the Silver Zone parking provision, particularly as proposed in Phase 2, requires that many environmental issues concerning both lighting and overall design be resolved first. It is essential that this be clearly acknowledged.

The Airport indicates (Planning Statement pp70-72) that it is unable to meet its future car-parking requirement within the present Green Belt inset. We would suggest that the underlying problem here is inadequate development of access by public transport. Rather than planning for an extension of the area removed from the Green Belt here, we propose that our suggested access by Maglev rapid transit* should be implemented forthwith, thereby reducing greatly the need for parking.

We would point out that, in the context of the Issues and Options consultation for the Local Plan to 2036, which was recently carried out by North Somerset Council, an appropriate Green Belt strategy is important and, regarding the future of the Airport Green Belt inset, four options were included in that consultation (pp74-75). 1) is to retain the present inset, 2) is further to remove from the Green Belt all the present Airport area including runways, taxiways and the Silver Zone, together with an ecologically important area above Goblin Combe. Options 3) & 4) indicate further land allocations and removal from the Green Belt of adjacent land immediately to the northwest. We suggest that neither 3) nor 4) should be contemplated, they are entirely unacceptable, whilst option 2) should also be rejected until such time as the Airport has dealt convincingly with the present planning requirements of CS23.

Problematic Road Access

The Local and sub-Regional Roads are already congested (see for instance the extensive data supplied within this present application) and remarkably little remedial work on the local network is now contemplated in the medium term (see the evolving proposals within the West of England JSP). It is entirely unclear from what sources those large sums of additional capital, necessary for local roadbuilding, might now come.

No prospect now exists of funding A38 improvements towards Bristol under the recently revised (TEW 2018-19) JSP proposals. And substantial location-specific engineering costs would arise along the A38 (particularly around Barrow Tanks). Pursuit of this objective would presumably now require action via BSWEL which is notable for words but not deeds. It is also unclear how Junction Improvements with Downside Rd will proceed since a source of funding remains elusive and substantial junction improvements require substantial land acquisitions (see extensive datasets and predictions within this present application). Brockley Combe is also a highly undesirable route to and from the West on environmental grounds (as it passes the North Somerset Special Area of Conservation associated with the two species of Horseshoe Bats). Furthermore, proposals for improved access to M5 via a new EW connection from the A38 towards W-s-M are now rendered implausible since the proposed new J21a is withdrawn in the revised JSP (2019).

Economics

Economic assertions and forecasts made by the Airport appear very questionable. Firstly, present expansion at this Airport is primarily attributable to outbound tourism. Note also (2016 to 2017) the large increase in domestic charter, and substantial increase in scheduled international and charter international but with small increase only in scheduled domestic. Inbound (foreign origin) tourism and inbound (foreign origin) business activity is low. Tourism is a very volatile and cost-sensitive component and is likely to be adversely affected by a future dominated by uncertainties and increasing concerns over climate change and pollution. We should also note that the employment projections do not indicate that the Airport proposed expansion to 12mppa will offer a substantial new employment benefit when weighed against the widespread and very substantial overall community costs incurred within this local sub-region of the West of England. The various employment projections are also internally (and worryingly) very inconsistent.

Natural Environment Mitigation and Human Cost

The mitigation proposals offered for the natural environment by Johns Associates are totally inadequate. The North Somerset and Mendip SAC is nearby and increases in light levels at the airport will inevitably impact bats and their flight paths very badly. There is also apparent confusion over which actual areas might be “improved” for bats etc.

Average surface noise contours along the flight paths would be substantially expanded by these proposals (see data within this application). This will inevitably bring considerable extra inconvenience and serious discomfort to local communities, especially at night.

Delivering improved public transport

The Airport is seriously out of step with national trends and with Government advice regarding the need to increase the access ratio (Public transport /Private car). Moreover, public transport access via the roads is subject to increasingly problematic road congestion, with associated uncertainty in arrival time.

Our own proposal for public transport* makes constructive good sense and affords real benefits for the local economy (including the Airport).

Conventional Light Rail access (reliant on friction between wheel and rail) is heavily constrained by the locally hilly topography and also by the dense urban development within Bristol. Tunnels are expensive. A Maglev transit system* by contrast can climb substantial gradients and could follow existing waterways, supported on pylons. Airport access would be then be delivered as part of an overall off-road rapid transit approach to the present commuting problem within the West of England sub-region.

*Our Maglev proposal is supplied as a separate document.

Our overall conclusion regarding this present planning proposal

The outline proposals within application 18/P/5118/OUT appear broadly consistent with the objectives and projected growth previously outlined by the Airport. But the evolving reality (see above) is likely to constrain those proposals. Much damage would be done by such proposals and the associated benefits are uncertain.

Overall, we would therefore recommend refusal of planning permission on the grounds that a) there is insufficient preparation for the off-site implications of the anticipated extra passenger movements and b) that the environmentally deleterious impact is profound and the (proposed) mitigation has remarkably little meaning.

Dr Robin Jeacocke

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on behalf of

Churchill and Langford Residents Action Group