

## **Winford Parish Council Response to the Planning Application by Bristol Airport to raise their passenger limit from 10mppa to 12mppa**

**Planning ref 18/P/5118/OUT**

**Objection** Winford Parish Council objects to this proposal because of the detrimental effect this considerable increase in passenger numbers and flights will have on the lives of the people of Winford Parish.

### **Objection Statement**

With this application Bristol Airport promotes expansion from their present 8.5 mppa (capped at 10) and will allow them a new cap at 12 mppa, giving them at least a 40% increase in passengers compared to today. Therefore local residents will have to suffer something like a 40% increase in disturbance. Where 8 vehicles drive today 10 -12 vehicles will be trying to drive there at the Airport's 12 mppa. It is not just arriving passenger cars, it is also the additional service vehicles for supplies for catering and retail outlets. Also for the next 6 years additional materials and labour will be arriving for the ongoing extensive building work, all by those same crowded roads. The road infrastructure is just not up to it without at times massive traffic disruption. This disruption happens at times already and these additional journeys will make these disruptions much more frequent.

There are no worthwhile improvements in road layout or capacity being constructed. Plans yes and occasionally we get visions and suggestions of proposals for road improvement that seem to go in and out of fashion but nothing more than a few road junction changes get delivered.

There is no progress on any other form of alternative airport access transport other than these unsatisfactory roads. New direct motorway access roads are discussed or a metro rail, but these are many years in the future.

This objection also maintains that road crowding throughout Winford Parish is getting worse. The level of complaint in the last 2 years shows that the residents of Winford Parish have had to suffer many years of this increasing airport related noise and disturbance day and night, from aircraft and traffic.

In 2010 the Airport produced their last major planning application to which this Parish council objected (Appendix C). Regrettably the disturbance factors described then all remain, increased today in volume with no significant improvements delivered.

The level of noise impact on householders should be examined in great detail given that the Airport's own consultants predict that 5,150 dwellings around the Airport will notice intrusive noise levels from night flights. At a number of dwellings the impact could be disruptive.<sup>1</sup> The UK.Gov terminology not ours. Our residents expect this issue to be properly addressed, and that a sufficiently knowledgeable independent opinion is sought to ensure that noise levels are properly judged in the context of the proposed increase in summer night flights and frequency of flights in general.

An analysis of the main reasons for objection submitted so far from Winford Parish residents is at Appendix A; the total of 97 objections made by 17.30 on 25 January represents a significant proportion, over 10%, of the total number of households in the Parish. One comment in support has been submitted from a resident in Winford Parish. The following paragraphs set out the reasons for the Parish Council's objection and reflect our residents' main concerns.

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<sup>1</sup> See Noise section below and Appendix B

## **Surface Access**

Surface access in this area can only mean roads as there has been no progress towards any other sort of transport system links to the airport. Motorway traffic on the M5 from North or South heading for the Airport has no clear fast link road to use. For decades there has been talk and outline plans but no material progress.

Locally in North Somerset, BANES, and South Bristol there has only been one new road of relevance to accessing BA, the South Bristol Link. That brings airport bound traffic from east and west Bristol to join the A38 stream of traffic out of central Bristol. They join the A38 which is mostly a single lane in each direction and subject to tail back congestion at a number of sites. This is also South Bristol's road to the motorway and one of the few alternative routes South.

This congestion spills off into the lanes around Winford Parish which frequently get an influx of semi-confused drivers trying to find their way through small country lanes, often only a single car wide, to get around jams and back onto the A38. The cause of this congestion is frequently the airport junctions.

The Airport's plans now submitted show major changes to West Lane junction with the A38 in Lulsgate Bottom. This is just as well as this road is a major feed from the B3130 in Winford for A38 bound (airport) traffic from the East. West Lane, or Felton Lane as it is called in Winford, is a turning off the B3130 that runs through Felton and on to the A38 junction at Lulsgate Bottom.

The Barrow Lane junction of the B3130 coming from Chew Magna through Winford joins the A38 at an extremely difficult junction. This is a site of frequent risky manoeuvres as Barrow Lane traffic attempts to cross a fast uphill stream of traffic from Bristol to join another faster stream heading down the hill towards Bristol. Changes to the highway are desperately needed to alleviate this problem.

Congestion and danger at junctions from the Parish roads with the A38 has often brought complaint from locals and is one of the issues raised by residents in their responses – see Appendix A.

## **Wider Surface access**

There may be developments in regional strategy that provide some future improvement to wider surface access to the airport, but nothing of significance has yet been agreed on and is far from delivering relief of some of the problems caused by the difficult location of the airport. This part of North Somerset is soon going to be experiencing a large increase in residential capacity which will put further pressure on roads in the area. Public transport access from all directions other than from Bristol is extremely poor.

The Parish Council is concerned at the lack of co-ordination in regional transport strategy and insufficient integration with airport development aspirations going back over a long period of time. Decisions cannot be taken in isolation and we would argue the influence of the airport on traffic flows is of sufficient regional significance that decisions on its expansion need to take into account the reality and timing of regional development plans.

## **Airport Parking**

This remains one of the most disturbing and contentious factors which has created huge resentment and local disturbance and complaint, which North Somerset Council is well aware of. Commercial and semi-commercial operators have now opened up a wide range of parking activities, with publicity now through Internet advertising, and there are still a number of unregulated parking fields that have been in nomadic operation for many years. The Local Authority seems unable to clamp down on these operations. In addition 'Meet and Greet' and 'Park in my drive' are two of the more recent types of operation.

Many of these last operators have no great amount of parking space on their own premises so they park additional booked vehicles around the village roads. Residential streets, field gateways, anywhere there is a bit of space. The vehicle owners probably have no idea that the car they thought was being looked after on someone's quiet drive is really being shuttled around the village streets to enormous local annoyance. Airport parking is a 24 hour operation and cars being left or retrieved frequently causes sleep interruption alongside the more obvious aircraft noise disturbance. Village parking has regrettably led to frustrated

vandalism, a piece of petty lawbreaking that should be totally avoidable if these parking operations were restricted to parking on their own property.

Whether the parking operator has insurance for commercial vehicle movements is questionable as is the legality of the operation and the loss to the tax authorities for this income.

Along with these 'commercial' parking operations there are always the owners who, arriving near the airport, just park a car and get a taxi or walk to the airport. Again this is a 24 hr operation causing disturbed householder resentment.

We must conclude that, however many commercial parking options there are at or around the airport, there will be a number of Airport passengers who will choose to dump their car somewhere around the area for free parking. Therefore we must resolve this with what measures we can, with the assistance of Bristol Airport finance and North Somerset staff as they have responsibility for public roads and parking.

### **Airport car waiting**

This term is used to differentiate it from parking, which is longer term. Waiting is shorter term and usually the driver is with the vehicle and waiting for arriving passengers to pick them up. Locations are generally closer to the Airport, but any free space will do.

Unfortunately Felton Common is one of the popular places for this and social media seems to have spread the word and the location is well known. The parking space is provided for people who want to use the common for recreation but the Parish Council have had many complaints that the parking area is full of taxis or private cars waiting to pick up at the Airport.

### **Taxi Waiting**

In the absence of a free facility at Bristol Airport, numerous taxis are waiting around the end of West Lane, Felton, and on the Common by Saint Katharine's Church and Felton Village Hall. The majority of the vehicles are private hire taxis and companies offering pick up and drop off to other parking locations/hotels and B&Bs. This causes a lack of space for residents and visitors. This is particularly acute at Felton Common, where church goers and recreational users are often unable to park. This is a particular problem during weddings and funerals. Vehicles unable to find space on the road or the church trees carpark are damaging the verges and the Common by parking on the grass. Vehicles are often parked in dangerous positions, for example next to the cattle grid at the A38/West Lane junction, impeding visibility and requiring other vehicles to pull into the opposite lane. Littering and occasional offence through toilet activities is a massive problem, especially at the church trees carpark on the Common. Light pollution caused by taxis sitting for long periods with their interior lights on is spoiling the tranquillity of the Common and is a disturbance to wildlife.

The proposed Heads of Terms of the Section 106 Agreement states the following:

*PS D3 para7 a) .....Authorised Waiting Area for private hire vehicles combined with an additional drop – off facility at BA. **This Facility would be appropriately charged and time-limited to reduce demand for short-stay waiting off-site.***

"Charged and time limited" will effectively send the majority of taxis back to the waiting area on Felton Common. In order for this facility to be effective it must be free and clearly publicised.

The Parish Council will be looking for rapid early progress towards the implementation of Traffic Regulation Orders and other matters relating to parking controls, regardless of whether this application is approved or not.

## Air Quality

The Parish Council is very concerned that air quality at the approach to the northerly roundabout on the A38 (Felton Primary School monitoring station) is already at or over the legal limit for nitrogen dioxide, hitting a high of 74.6 µg/m<sup>3</sup> in November 2017 (unadjusted) and with an annualised bias adjusted mean of 40.7 µg/m<sup>3</sup>. This is by far the highest figure for all the monitoring stations in North Somerset, which are generally in the low twenties/high teens.

An increase in traffic to and from the airport as a result of this proposal will have a particularly adverse effect at this location where queuing traffic is inevitable due to the rules of the road at roundabouts. There are 2 households on the School site and 10 households on School Lane just beyond the old school buildings. A hotel is planned near this site, there is a car hire business currently operating from the premises and Felton Allotments lies just to the east. Whilst these last are not residential uses, people will be working at all these - in some cases for considerable lengths of time over the year. There is evidence that high levels of NO<sub>2</sub> can inflame the airways in our lungs and, over a long period of time, affect how well our lungs work. People with asthma are particularly affected.

It is particularly concerning that the exceedance at Felton Primary School site has been ignored in North Somerset Council's 2018 Air Quality Annual Status Report, which states that annual levels of NO<sub>2</sub> across the district are below the annual air quality objective of 40 µg/m<sup>3</sup>. We believe that at this level the local authority is required to declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) within 12-18 months setting out measures it intends to put in place in pursuit of compliance with the objectives. The need to reduce traffic related pollution at this site would appear to be totally at odds with expansion of the airport.

It should also be noted that with the proposed demolition of the old terminal (now office buildings) a number of new aircraft stands are planned which with service vehicles will be bringing sources of pollution considerably closer to the location of the school monitoring point. Therefore it should be expected that the readings of that location monitor would show higher levels of pollution in future when those aircraft stands are in operation.

Additionally, the Environmental Statement states that *"Airport operation can be a source of odour which causes loss of amenity to nearby receptors. However, no records of odour complaints have been received by either BAL or NSC. Therefore, impacts from odour have not been assessed further."* The Parish Council strongly object that this issue has not been considered: at least eight of the objections put forward by residents refer to this as a problem (see Appendix A).

## Aircraft Noise

Noise, and in particular night flight noise, is a major complaint of local residents (see Appendix A). We are particularly concerned at the proposal to increase the number of summer night flights as a result of introducing flexibility in the annual cap between summer and winter allowances. This must not be allowed. Neither should the Airport be allowed to 'borrow' from previous years' underused allowances.

The noise report in the Environmental Statement (Page 7-50 para 7.10.51) states that:

*"As air traffic increases in the future at night, the number of dwellings that are exposed to noise levels at or above the LOAEL will rise, from 3,750 in 2017 to 5,150 in 2021. The number of dwellings exposed to noise levels at or above the SOAEL increases from 150 in 2017 to 300 in 2021. Of these dwellings, 15 will experience an increase in noise level of 2 to 3 dB and an absolute level above the SOAEL. This constitutes a moderate adverse effect for these dwellings. The remaining dwellings experience either lower absolute noise levels or lower changes in noise level, which constitutes a low or very low adverse effect."*

The conclusions provided in the Environmental Statement are at odds with the definitions for LOAEL and SOAEL given by DEFRA.<sup>2</sup>

DEFRA and other government building specialists say that people experiencing noise levels at LOAEL perceive it as Noticeable and Intrusive and that one would expect "changes of behaviour" and "having to

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<sup>2</sup> Appendix B

close windows for some time because of the noise” and they would have “a perceived change in the quality of life”. For those people in the dwellings experiencing above LOAEL (above LOAEL means SOAEL.) the experience would be likely to be “Noticeable and Disruptive” and they would have “material changes in behaviour and attitude” and see their quality of life as diminished.

They would not class it as a “very low effect” as said in the BAL environmental statement.

What is BA going to do to mitigate this potentially damaging intrusion?

### **Development controls**

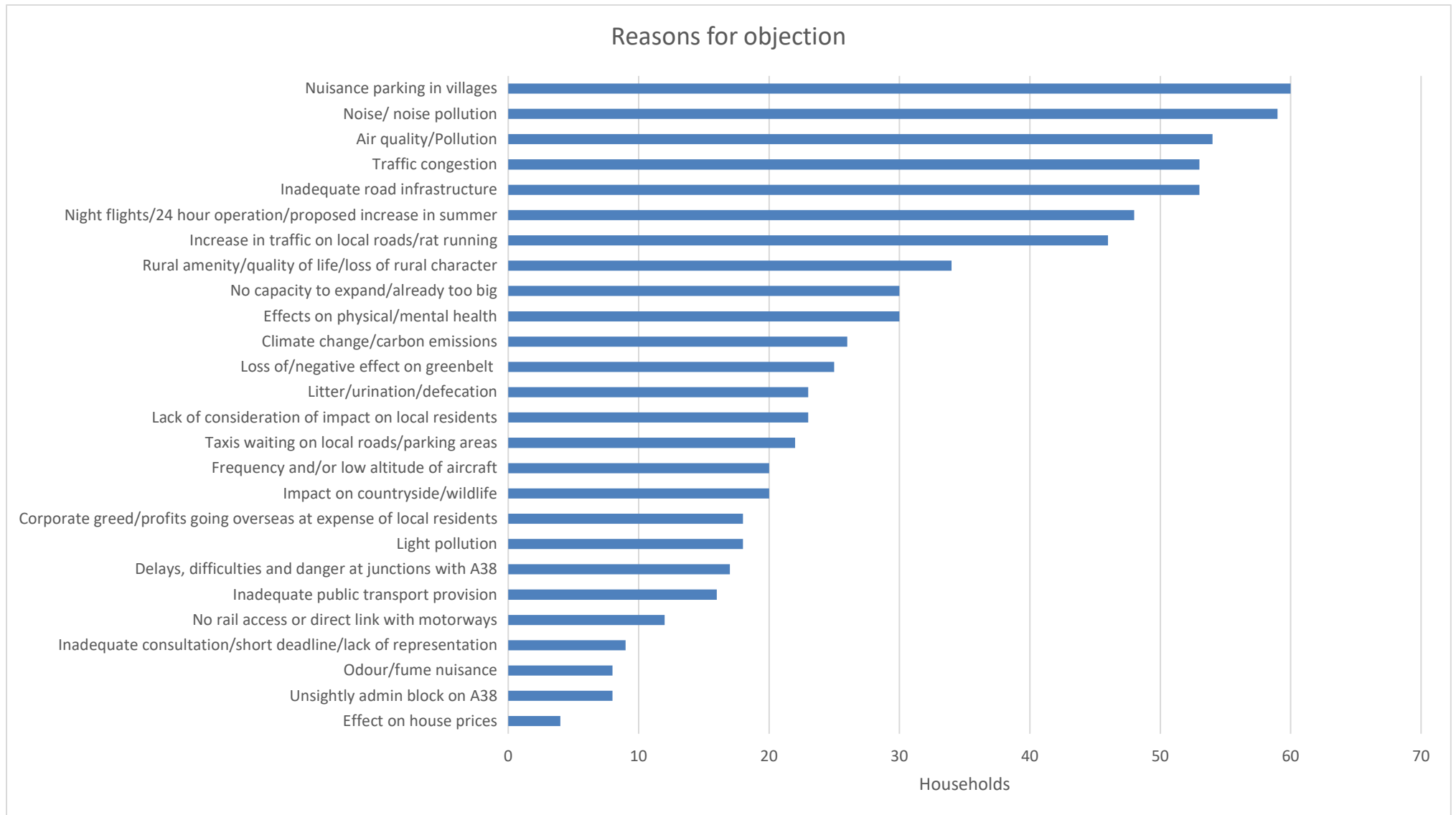
We have had a lot of complaints about the new airport admin building and the fact that it was built apparently without planning permission. The airport has argued that this was permitted development as an operational building. Part 8 of the Town and Country Planning (General Permitted Development) (England) Order 2015 states that *“operational building” means a building, other than a hotel, required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods at a relevant airport*”.

This does not include administration and this building should have never been built without full planning scrutiny. This highly intrusive building in the greenbelt is further evidence that North Somerset Council is not applying proper controls over airport development.

### **Environment**

We fully support the Parish Councils Airport Association in their concerns at the damage that this application will do to habitats and species populations in the vicinity of the developments. We deplore the proposed loss of greenbelt land to parking and we would expect North Somerset Council to ensure that the multi-storey car parks planned are completed before more greenbelt land can be taken. Finally, the potential impact of encouraging more and more air travel conflicts with the achievement of international targets for carbon emission reduction.

## Appendix A – Analysis of residents' objections



## Appendix B Noise definitions

Noise definitions from UK.Gov website : Guidance for Noise. Advises on how planning can manage potential noise impacts in new development. Published 6 March 2014

Perception	Examples of outcomes	Increasing effect level	Action
Not noticeable	No Effect	No Observed Effect	No specific measures required
Noticeable and not intrusive	Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.	No Observed Adverse Effect	No specific measures required
	LOAEL	Lowest Observed Adverse Effect Level	
Noticeable and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, eg turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Observed Adverse Effect	Mitigate and reduce to a minimum
	SOAEL	Significant Observed Adverse Effect Level	
Noticeable and disruptive	The noise causes a material change in behaviour and/or attitude, eg avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
Noticeable and very disruptive	SOAEL Extensive and regular changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, eg regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, eg auditory and non-auditory	Unacceptable Adverse Effect	Prevent

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## **Comment on Bristol Airport Expansion Proposal**

**Planning ref 09/P/1020/OT2**

### **GENERAL**

This Parish Council objects to the unconditional expansion of Bristol Airport because of the detrimental impact this expansion will have on local residents. The impact comes from poor surface access and locally from noise and environmental issues. Residents feel they will suffer an unjustified share of the total air transport impact. There is also concern for the local impact of 10 years of the construction projects around the airport site.

Planning authorities should refuse this expansion or consider capping the growth of the airport until surface access infrastructure projects are delivered. Planning consent should not be granted unless there are satisfactory answers to the many questions raised by this application. This Parish Council as the most affected parish in North Somerset, would welcome the opportunity to discuss these issues with the District Council. It must be appreciated by the planning authority that Winford Parish is on the direct flight path into BIA and that aircraft, both in landing and departing, fly only a few hundred feet above the villages of Winford and Felton - we really do have a special case.

### **SURFACE ACCESS**

There are insufficient suitable access roads, and insufficient public transport alternatives.

All passengers access BIA by road, and the inadequate road infrastructure leaves many country lanes carrying considerable traffic volumes. These roads were not designed for and should not take frequent, sometimes heavy, airport traffic. West Lane Felton and the B3130 through Winford, Downside road from the A370 to the A38, the B 3130 through Barrow Gurney, and Chew Magna also, all fall into this category. These are all grossly overloaded for their size and structure, one example being junction visibility all along these minor roads. One junction where this is a considerable hazard is Regil Lane joining at a bend of the B3130 at the east end of Winford. These roads are simply not suitable for high traffic volumes now.

In the Winford Millennium Parish Plan survey conducted in 1998 more than half of respondents in this parish were satisfied with the general state of the roads. Now 10 years on and in a recent survey with over 400 respondents 94% express serious concern with the road conditions and 83% are concerned about the volume of traffic. During this time the passenger numbers through the airport rose from 2 to 6.2 mppa, and they want to increase further to 10mppa. The road traffic rush hour disruption now impacts local residents four times a day, twice for the airport and then twice for the Bristol rush hour.

Felton Lane off the B3130 from Winford through Felton as West Lane to the A38 is a C class road, with no footpaths and no speed restriction for two thirds of its length. In the airport application it is expected to show traffic growth of 120%, far in excess of the B3130 because it is a short cut to the airport. This road needs attention.

All airport traffic ends up on the A38, mostly approaching from the north. Fiddling with a few junctions will not deliver effective long term road improvements. However temporary improvement could be gained from a revised junction scheme proposed at the time of the building of the existing Terminal. This addresses the critical section of the A38 just north from the airport roundabout to the junction with West Lane Felton. Details of this and a diagram are attached to this submission.

Road maintenance - This Parish Council has recently had a meeting with NSC staff to discuss the poor state of roads throughout our parish, many of which carry considerable airport traffic. We were told that we were getting rather more than our share of the available funding. Again this comes back to the volume of traffic on minor roads.



Is the district council adequately funded to maintain the roads in a reasonable state throughout what will be a two thirds increase in traffic on top of the doubling of the last 10 years ? There is a general view locally that a reasonable state is not maintained at present.

Fly parking on local roads and common land has become a much more frequent cause of annoyance, and regrettably attracts occasional vandalism. Undue limitation on reasonable and legal off airport parking applications will increase the incidence of fly parking, so all applications should be given a fair hearing. The Airport does not have the right to hold a monopoly on parking.

## **PUBLIC TRANSPORT**

The Flyer bus service to Bristol is good, although expensive. However passenger take-up is still low and there is almost no other public transport available. Flyer passenger usage figures must be taken carefully as they are frequently expressed including the staff usage, which is significant. Air passenger usage is still disappointingly small.

The concession offered in the draft 106 agreement for three local postal areas to pay a 50% fare is not that generous. Half of a very expensive fare is still not cheap and of limited use with the few stopping places. To be locally effective certain of these bus routes should be diverted through Winford and Felton, say two an hour.

The rapid transport system in South Bristol is not likely to offer any improvement within the timescale of the project. Design is still at the concept stage and funding is not yet allocated so it may never be built, but if it is built extension of the route out to the airport is still only a distant prospect.

Planning authorities should refuse this expansion or consider capping the growth of the airport until surface infrastructure projects like the rapid transport system are in place.

## **NOISE – Aircraft**

Noise complaints are not large in numbers, not because residents don't mind the noise but because most people don't think there is any point as nothing gets changed. But all meetings by the parish council on any airport related topic will soon bring out noise complaints, frequently these relate to better weather when people want to open windows more and spend time in the garden.

The aircraft noise contour maps in the application are unclear to the layman. Are they based on recent measurement or older figures with a future projection ? Has that projection assumed quieter aircraft and do these noise contours expand as flight numbers increase ? These issues will be significant in consideration of mitigation actions discussed below.

The noise insulation grant scheme must be reopened to ensure what was installed before meets current building standards, and that any properties that missed out on the scheme last time can now claim. The areas where a noise insulation scheme is offered should include the full extent of the noise contour when the increased 10mppa will be felt. The scheme should allow for noise insulation beyond just the window scheme previously offered. In high impact areas wall and roof insulation should also be considered for inclusion.

However noise mitigation measures for buildings cannot improve the summer situation when people naturally want to live with open windows or spend more time outdoors.

## **Noise – Night Noise**

Night aircraft movements always bring many complaints and the airport management has expressed itself satisfied to cap their night noise quotas at 2005 levels. This is not good enough and a reduction in that quota should be the new target.

## **Noise – Road Traffic**

Night noise flight limitations take no account of the traffic noise that starts approximately 2 hours before the busy 6.00 am flight period. Residents suffer noticeable increases in road noise from 4.30 am onwards.

Undoubtedly road traffic noise contributes greatly to the disruptive effect that the airport traffic has on the local residents.

## **GROUND IMPACT RISK**

There are planning restrictions based on ground impact risk for areas sited directly in front of both ends of the main runway, and at the east end there are houses within the 100,000 contour. Are the contour maps based on current or 10mppa throughput ? As the number of flights increases then owners of properties who become included in an expanded risk area could find difficulty in selling and a reduced value of the property as a direct result of the airport expansion. What mitigation offers for this risk are the airport making if any ?

## **NEED**

There is insufficient justification for the imposition of the impact of further passenger numbers on the local residents.

All the studies used as models for this expansion are now out of date because of the recession, but the planning application still uses them to justify the expansion. Passenger demand, road travel and government approval and financing of associated works, these figures are all based on pre-recession studies and forecasts.

Passenger numbers have recently shown a marked downturn, down 18% in first 5 months of 2009. Is there really a need for this considerable airport expansion ? It does seem that the Airport intends to expand beyond the likely demand for many years to come.

Local and regional businesses get many of the flights they require from the present airport routes and see little advantage in expansion. Lufthansa withdrew when their flights had poor use and local businesses initially showed little or no response to the airport seeking the justification for this expansion.

## **POLLUTION & ENVIRONMENT**

It is probable that because of the exposed location of the airport there is sufficient air circulation to avoid concentration of pollutants. However the carbon emissions from the aviation industry are significant in spite of what is claimed by the air transport industry.

Light pollution in a rural setting is a considerable irritant and a lot should be done to reduce the existing light spillage, and carry these principles on into any expansion plans.

The airport proposes a new area of overflow car parking on Green Belt land on their southern boundary. This change of use should not be approved as it is wrong in itself and will be seen as a precedent by any land owner in the area wanting to start airport parking. If the airport are allowed to do it why should others be denied ? It cannot be argued that the traffic is contained on the site as the A38 has to be used to complete the link to the airport from all south side parking.

Government and public opinion are now more aware of the damaging climate change issues. If as seems likely these issues result in higher airline fuel bills and higher seat prices then passenger numbers have further downward pressure.

## **MITIGATION MEASURES AND 106 AGREEMENTS**

Expansion in passenger throughput at the airport should not be unconditional. However as demand grows in the future, then additional funding should be required from the airport for infrastructure and other mitigation works.

The draft 106 agreement contained in the airport application makes several offers of funding or future actions conditional on reaching a specific mppa or external project action. It is important that NSC should similarly cap expansion at the airport dependent on specific target improvements. These targets should relate to specific works to reduce the problems and the impact of additional passengers and flights. Surface access improvements and community projects should be able to benefit from this.

A number of the obligations taken on by the airport and listed in the draft 106 agreement are expressed in such vague terms as to be virtually worthless. The terms 'use reasonable endeavours' and 'where appropriate' give too much room to avoid doing anything useful and the airport must provide more specific and detailed actions to take by a specific date. All mitigation measures should be exact, precise and measurable.

As has been stated this parish council opposes this airport expansion but if North Somerset District Council are mindful to allow any expansion to proceed then there are specific works that would improve the lives of local residents. All these should be considered for funding under a 106 agreement.

- The provision of a foot/cycleway from Felton to the A38 to complete phase 2 of the project.
- Work to make safe the junction in Winford where Regil Lane joins the B3130.
- Completing Phase 3 of the Winford centre improvements project.

## **PROJECT MANAGEMENT & CONTROL**

In the construction details there are provisions for noise attenuation measures, walls, buildings and landscaping which will be valuable to the local residents. But what if the Airport just don't get round to doing all this. There must be business restrictions or financial penalties to ensure the airport focus on completing the good works they now offer, and on the promise of which approval may be gained.

If the project is allowed to go ahead NSC have many supervisory responsibilities throughout the project which is given as 10 years. Are they staffed and budgeted to manage their responsibilities properly, or are they going to be forced to allow degradation in local services through lack of staff and lack of budget ? Are there any plans to increase the staff in those departments responsible for control of the airport project should it be allowed to proceed ?