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Development Management  
North Somerset Council  
Town Hall  
Walliscote Grove Road  
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Dear Sirs

**APPLICATION 18/P/5118/OUT - BRISTOL AIRPORT, NORTH SIDE ROAD, FELTON, WRINGTON BS48 3DP**

This Council is disappointed that the Applicant chose to deliver this Application immediately prior to the Christmas and New Year period when the Application consisted of some 127 documents, many of a highly technical nature, and regards this tactical manoeuvre as being a deliberate ploy to minimise the opportunity for in depth scrutiny by interested parties, including Parish Councils such as ourselves, and to pressurise North Somerset Council to reach a decision on this controversial application without proper opportunity for challenges by interested parties and statutory consultees. Nevertheless, this Council objects most strongly to the Application and makes the following comments in support of the objections.

**PLANNING STATEMENT**

This document contains several factual inaccuracies which must undermine the overall credibility of the document, when even basic facts are inaccurate. Elementary examples are (i) Para 3.2.4 which states "*BAL [Bristol Airport Limited] is surrounded by extensive woodland areas to the east.*" when the airport is not "surrounded" by extensive woodland areas, but sits atop of a plain and those areas that are extensive woodland are to the west of the airport! (ii) Felton Village is described as lying to the northwest of the airport and extending along the A38 highway, whereas in fact, the village lies to the northeast of the airport and does not extend along the A38.

Although in para 1.3, the airport claims to have had "meaningful consultations" regarding their expansion plans, and claim to have correlated the responses to the said consultations, there is no independent verification that the results are an accurate reflection of the responses received, and this should be tested and challenged. From the information provided relating to workshops and drop-in sessions held in some local venues, it would appear that attendance was moderate to poor and it is arguable that the results may not be a true reflection of opinion. Indeed the number of objections on NSC's website in relation to this Application would tend to support that view.

Para 2.3.14 indicates that "*BAL is seeking to merge summer and winter [night ie between 23.30hrs and 06.00hrs] movement limits (3,000 and 1,000 respectively) to an annual (across two consecutive seasons) 4,000 movements limit.*" Is this to say 2,000 winter + spring and a further 2,000 summer + autumn or are they seeking to expand the spring/summer quota to say 3,500 and reduce the autumn/winter quota to 500? Any move towards 'annualised' numbers of night flights would provide the airport with the ability to 'carry forward' unused numbers (for instance the lower period of usage such as November and December months) into the following more 'needed' positions later in the year which could increase dramatically night flights at the airport in certain months, yet still enable the airport to operate within its annualised limit of 4,000. Any increase in night flights during summer months would be most unwelcome and would have a serious (though apparently unconsidered) effect on the living conditions of local residents who would be expected to be able to sleep with their windows open during warmer summer conditions, but who would be prevented from so doing by increased night time air traffic, both incoming and outgoing. There are many residential properties to the north and south of the airport as well as those lying close to and under the flight paths to the west and the east. The overall effect on quality of life and associated health considerations from air traffic and vehicular traffic emissions of all kinds cannot be mitigated sufficient to justify this further and unacceptable intrusion. The airport fails to mention in its proposals that other regional airports in the UK have stricter regulations on night flights than those which apply to Bristol. For instance, at London City (also part owned by the owners of BAL), operational hours are limited to between 04.30hrs and 22.00hrs on weekdays, 04.30hrs to 13.00hrs Saturdays and 10.00hrs to 22.00hrs on Sundays and Liverpool airport where between 23.00 hrs and 07.00hrs, no take-offs are allowed on runway 09 unless aircraft weight precludes a runway 27 departure (runway 27 departures are over the

River Mersey whereas runway 09 departures are over populated areas). At Aberdeen airport, operational hours are simply limited to between 06.00hrs and 22.30hrs. Many regional airports, during night time periods only allow usage after prior permission has been sought and granted, whereas London Heathrow, Luton and Stansted are themselves limited by decibel output level (Indeed Luton's limit between 23.00hrs and 07.00hrs only allows departing aircraft to a level of 80dB within 5km of the airfield!)

Figure 2.5 sets out the projected passenger numbers as predicted by BAL for the period 2019 to 2045 but this extrapolated graph is prepared by BAL itself and, once again, is open to challenge as to verification of the figures, as there is a distinct absence of meaningful foundation for these projections which appear, in turn, to be based on projections associated with London Heathrow Airport – a totally different scenario.

Para 3.3.18 Indicates that it is proposed to erect on the roof of the Phase 3 Multi-storey Car Park (MSCP) (which height is approx. 16m), a series of eight wind turbines, and then goes on to describe the wind turbines as being 12m in height, or 15m if the diameter of the rotor blades is taken into account. Thus the overall height of the development would be approx. 31m which, it is claimed, is not obtrusive. Furthermore, there is also an expressed intention to top the Phase 2 MSCP, when completed, with wind turbines also. With a height of 31m, this proposed development cannot fail to be intrusive and detrimental to the openness of the Green Belt and would also be clearly visible from the Mendip Hills AONB, let alone the residents of Downside Road. This Council would suggest that perhaps this proposal be reconsidered and wind turbines be replaced by say photovoltaic cells on the MSCP roofs.

Para 3.3.44 highlights BAL's wish to have their operational boundary revised (ie widened!) in order that they may take advantage of further use of permitted development rights. This Council would firmly oppose that request and would seek to retain existing operational boundaries in order to have an input into BAL's growth aspirations into the future. There is no justification, other than as an expedient for BAL, for expansion of the existing operational boundary. This is a Regional Airport, surrounded by Green Belt land, not a major international hub, such as exists at, say, Heathrow or Gatwick airports.

Para 3.4.10 indicates that by 2026 there will be a predicted total of 97,373 annual aircraft movements at BAL. If one allows 4,639 night-time movements to be subtracted from that figure, it still equates to some 15 flights per daylight hour (or one flight every 4 minutes), with undoubtedly more movements during summer months. Currently night flights are limited to 4,000 annually (see Para 2.3.14 above). This increase and the resultant collateral pollution and nuisance in terms of vehicular traffic, ground and air noise and pollution cannot but have an adverse effect on health, quality of life and biodiversity and landscape which would be unacceptable.

§106 Terms are set out in Para 3.5 and cover such subjects as highways improvements, sustainable surface access, air quality, noise (air and ground), environment and biodiversity, community and environmental improvement and employment and skills. However, none of the above seeks to seriously reduce carbon emissions or reduce noise disruption levels that increased air traffic will create. Pollution, carbon emissions and noise disruption will all increase, eliminating any carbon reductions made elsewhere within the Region. With Bristol already being recognised as one of the most polluted cities in the country, this situation is unacceptable both scientifically and morally. Overall, the terms as drafted are skewed heavily in favour of BAL and are utterly inadequate. It does little or nothing to address the compound effects of the proposed expansion upon the local community, environment, bio-diversity, light pollution, traffic and health impacts caused by the increased pollution levels upon the south west – pollution acknowledges no borders.

Paragraph 148 of the National Planning Policy Framework (NPPF) requires planning to support the transition to a low carbon future and take climate change into consideration. This application seeks to do the reverse.

Paragraph 170 of NPPF says (*inter alia*) that the natural local environment should be contributed to and enhanced, including protecting and enhancing valued landscapes, biodiversity....preventing new development from contributing to levels of noise pollution.

Paragraph 180 of NPPF states that planning decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise and avoid noise giving rise to significant adverse impacts on health and quality of life.

This Council fails to recognise how the proposals put forward dovetail with the parameters set out above in the NPPF.

Para 4.4.3 - It is an exaggeration to claim that the Aviation Policy Framework (APF) recognises the "vital" role played by BAL in the economic success of the South West Region. The APF only refers to regional airports' contributions as being "important" – not "vital". Para 4.4.4 states that the APF states the Government wants to see the best use made of existing airport capacity. It does not advocate or support expansion plans at regional airports such as the proposals contained in this Application.

Para 4.5.5 – Strategic Economic Plan 2015 – 2030 – prepared by the West of England Local Enterprise Partnership (at which BAL had substantial influence, and, it may be contended, had a vested interest and therefore a conflict of

interest in) sets out a vision for economic growth which is managed sustainably to ensure that those within the sub-Region benefit and that the environment is protected and enhanced. This vision fails to accord with BAL's development aspirations, despite their close involvement with the Partnership and would appear to be a case of 'words and figures differ'! Para 4.5.8 may be considered aspirational heads of terms, but is in reality meaningless in relation to this Application.

Para 5.3, relating to development within the Green Belt states that "...with 'very special circumstances' having been accepted by North Somerset Council in respect of those components of the scheme that are necessarily located within the Green Belt". Is this not premature, since only by submission of this application can 'very special circumstances' be acknowledged? As stated in the Planning Statement, it implies that further incursion into the Green Belt, if for the purpose of ground level car parking, is already a 'done deal', which is outrageous.

In Para 5.3.8 BAL acknowledges that the proposed extension of the Silver Zone car park (Phase 2) is considered 'inappropriate development within the Green Belt' and that the operational change to Phase 1, being a departure from an existing permission, may also be considered 'inappropriate', but notwithstanding, North Somerset Council has accepted that very special circumstances exist to accommodate the phasing of surface car parking. This Council cannot equate such decision to increase car parking facilities within the Green Belt with either supporting or encouraging alternative modes of travel or 'mass-transit' travel and therefore cannot support this further development on Green Belt sites which will only continue to spread if current policies are continued.

Para 5.3.22 indicates that Silver Zone bookings were 54% and other airport car parks 36% booked two weeks in advance. To extrapolate this statement to say that there is a greater underlying demand for Silver Zone parking is a fundamentally flawed argument and a misuse of statistics. The figures could be a result of the price differential, or a reaction to BAL's pricing policy if cheaper alternatives are available elsewhere. If lower cost car parking is perceived to be more attractive to passengers, then BAL should be reviewing its prices in the light of alternatives available and even within the airport facilities, in order to better 'spread the load' on availability. This is a fundamental tenet of marketing a service. If a price reduction of other airport car parks results in an increased take-up, is that not a 'win/win' situation?

The proportion of business travellers stated to be using car parking (17% of footfall) does not justify the large, higher cost car parking facilities and it is unsupportable to argue that case. If, for example, all sites were price equal, there would be a greater attraction to park as close as possible to the terminal building, thus maximising usage of the MSCPs. BAL already indicates that usage of the existing MSCP facilities is poor (Comments from Bristol Airport Parking Communities Group (BAPCoG) in respect of Application 18/P/4007/FUL), with spaces often unfilled, whereas with full usage, MSCP Phase 1 could accommodate 1,162 places, Phase 2 would add a further 716 spaces and MSCP 2 a further 2,150 spaces. It is indicative that during August 2018, the MSCP facility was far better used, which happened to coincide with a period when prices there were discounted to a level close to the rates for 'Long Stay'. This exercise indicates quite clearly that BAL seeks to maximise its profits by retaining north side car parking spaces for premium passenger public car parking, notwithstanding that figures for June to August 2018 indicate quite clearly that the market will not support premium pricing at the levels being employed. Current strategy is only going to continue to drive passengers to illegal, off-site car parks where a more realistic and cheaper pricing option is available, with consequent adverse impacts upon the Green Belt and neighbouring communities. The Parking Demand Study already indicates that airport car parking only accommodates some 76% of passengers' cars, with many using illegal, off-site parking sites in the Green Belt (which are cheaper).

With a more realistic (and some would say 'less greedy') policy in place, and better use of the MSCPs (when finally completed!), there could be a potential to reduce the need for extra Silver Zone car parking spaces or yet further incursions into the Green Belt surrounding the airport perimeter. This scenario should be pursued further in order to prevent loss of Green Belt which, if approved, will only continue to be exploited further as a precedent will have been set.

Until such time as better 'mass transit' or more sustainable means of accessing the airport are provided, there can be no doubt that the private motor car will be the preferred form of transport for travellers and so maximum utilisation of existing airport car parking facilities will and should be afforded, which includes maximising use of MSCP facilities whilst minimising further incursions into the Green Belt surrounding the airport.

Para 5.3.35 dismisses further multi-decking car parking as it would have "*significant visual impacts on visual receptors in Downside Road*", but yet it is still intended to install 15m high wind turbines on top of the Phase 2 and Phase 3 MSCPs! This argument is thereby totally flawed. As set out below in comments relating to the Design and Access Statement, there is room for further additional parking to be raised to the north side.

Para 5.3.46 It may well be that 'seasonal restrictions' are not commonplace (as in BAL's Silver Zone car park) for UK airports, but this statement begs the question 'How many UK airports are set in Green Belt areas and if there are others, how many of them have seasonal restrictions?' Otherwise this statement carries no weight whatsoever.

Para 5.3.52 It cannot be logically concluded that the proposed and sought extra low cost car parking facility available from further use of Green Belt land would lessen the opportunity for and impact of unauthorised car parks. In the final analysis it is all down to pricing, and as long as the 'unauthorised' continue to undercut BAL, then the problem will continue to exist.

Para 5.3.53 The proposed extension is not 'contiguous with the airport boundary', but rather contiguous with a previously approved (temporary) area which itself is contiguous with the airport boundary. This argument is therefore also flawed.

Para 5.3.54 It is far from conclusively demonstrated that there is an immediate need for further low cost car parking provision ahead of MSCP provision. It is all down to pricing (see comment re 5.3.22 above).

Para 5.3.56 This Council would dispute that the conclusion expressed in this paragraph is a fair or realistic conclusion. Reducing the prices of other car parking areas will meet better the demand for low cost parking. BAL are simply too greedy or expensive to be competitive. What of other regional airports? Have BAL considered that with the vast majority of their passengers being 'leisure' travellers, the provision of premium rate parking is already excessive and the provisions should be re-balanced in line with the needs? Holiday travellers will always seek low-cost parking – that's why many utilise services offered by off-site illegal operators; it isn't rocket science!

Para 5.3.57 No it will not. Please see 5.3.52 above.

Para 5.3.60 Despite maintaining that the proposals would not result in adverse environmental effects, maintaining the existing Green Belt boundaries ensures that further attempts at incursions into the Green Belt would need to demonstrate exceptional or very special circumstances and therefore would retain better control over BAL's expansionist plans (NPPF refers to "*within existing boundaries.*")

Para 5.3.62 Increased car parking equals increased pollution. Most outgoing passengers (particularly 'leisure') will spend money abroad, not in the southwest. Outgoers returning will spend little in the southwest, but will return home (unless of course they live in the southwest, which will mean they spend their money in that region anyway.). Profits from BAL's airport activities go to their owners/shareholders at the Ontario Teachers' Pension Fund (OTPF) (which fund also owns half of Birmingham Airport and a part of London City Airport) and not into the economy of the southwest. The southwest only receives increased pollution and noise. The Office for National Statistics (ONS) published figures for the period July to September 2018 indicate that, in that period, some 24.2m UK residents visited abroad (1% more than the same period in 2017) and spent abroad £16.4bn (2017 + 4%). Incoming visitors from overseas numbered some 10.8m (down 3% on 2017) and spent some £7.2bn (2017 - 15%). There is therefore a tourism deficit of 13.4m and a financial deficit of £9.2bn. It is therefore grossly unsustainable to claim that passenger traffic through BAL will greatly benefit the region's economy.

Para 5.3.66 Existing lighting at the Silver Zone is highly visible, particularly during winter months, with a substantial level of light pollution impacting upon the environment and the associated ecology. 'No further lighting' would be a welcome approach, but the use of Infra-red CCTV cameras would overcome the need for further lighting, as all cars would be valet block-parked. There will be enough ambient overspill illumination from the Phase 1 area to meet needs and not increase light spillage.

5.4.11 If WsM provides 13% of BAL's workforce positions and south Bristol 11%, where do the remaining 76% travel from? Is that really a significant impact on travel and congestion levels? The impact on so-called deprivation levels of respectively 100 and 90 extra jobs is hardly 'significant' and there is no justification to support the expectation that the anticipated new jobs will be filled from those areas' residents. This statement is therefore without foundation and must be disregarded.

Para 5.4.15 Any benefit accruing from incomers will be off-set by loss of benefits from outgoers. By no means all incomers will spend their time in the southwest and to claim otherwise is total fantasy. Where is the justification to substantiate this claim? (See also the figures from ONS referred to in comments re Para 5.3.62 above.)

Para 5.4.16 What exactly does this mean?

Para 5.4.17 This Council cannot support the logic of this conclusion from the information provided. It is one great leap from having been proven.

Para 5.5.3 This Council cannot accept BAL's claim that its £4m investment in the South Bristol Link Road and Metrobus route "significantly improves transport links to Bristol Airport" and no evidence has been produced to substantiate this inflated claim.

Para 5.5.5 A suggested increase of 5,576 vehicles (less than a 20% increase) is unsurprising given a 20% increase in passenger numbers from 10mppa to 12mppa and the consequent increase in FTE staff proposed.

5.5.11 If current public transport usage is only 12.5%, from what baseline figure was this calculated (ie how successful has the BAL contribution been and what percentage of benefit has been derived from it)? This figure of 12.5% is below that predicted in 2009 and indicates no progress has been made in improving usage.

Para 5.5.17 It is a giant leap to claim that the proposed Workplace Travel Plan will have a significant effect on the so-called “deprived areas of WsM and south Bristol” and is once again, unsubstantiated by facts. It is also a gross (and perhaps intentional) misrepresentation of statistics to claim (in the Workplace Travel Plan, Para 4.1) that there are 2,976 full-time employees at the airport, when the data includes employees of Bath Bus Company, First Bus and Arrow Cars. The latter are not employed by the airport, even though their employment may be due to the airport! A further 919 of that total are aircrew working for airlines based at the airport, which reduces substantially the figures being used. In addition, the Transport Assessment (Para 8.6.4) indicates that only some 58% of FTE staff are at work on any one day, but that with an increase of 2mppa, a further 700 FTE staff will be needed, with therefore some 400+ FTE staff working each day, all of which will further add to pollution levels created at the airport, which does not appear to have been brought into the equation..

Para 5.5.18 The plans set out in this paragraph will not reduce the unauthorised car parking operators’ market share if they are able to undercut BAL’s pricing. To claim otherwise is simply naïve and does nothing to address that problem.

Para 5.7 Air Quality. It would be useful to show not only mean (ie average) figures, but also max/min. figures, together with durations, times and dates, in order that a more accurate picture is painted to inform mitigation strategies, patterns and measures. To use only mean figures is a distortion of statistical data and tells only part of the story. As such, this case is fundamentally flawed.

Para 5.8.2 The calculation of land lost as a result of Phase 2 of the Silver Zone extension takes no account of the connectional land already lost to facilitate Phase 1 of the extension, so the resultant loss from Green Belt is considerably more than the 3.2ha claimed. The statement as written could be described as ‘economical with the facts’.

Para 5.9.4 Landscape. It is difficult to accept that a further MSCP and wind turbines totalling some 31m in height will have no adverse effect on the visual aspect of the airport, both locally and as seen from the Mendip AONB.

Para 5.9.5 The LVA Assessment does note impact on tranquillity, dark skies and outward views and it is not accepted that proposed development will have a negligible impact. Traffic alone (air traffic and local vehicular) is predicted to rise by 50%, so to assume ‘negligible impact’ is unacceptable a conclusion. The airport is certainly not “rarely visible”, unlike ‘Brigadoon’!

Paras 5.9.8 – 5.9.11 Visual. It remains difficult to accept that the erection of wind turbines atop of the MSCPs will not merit mention as being impactful on properties on Downside Road when they are said to be some 16m high. Also to describe a period of 15years as being of a temporary significance (Para 5.9.12) would probably not be accepted as ‘temporary’ by the residents of Melody Cottage.

Para 5.9.14 This is not acceptable and should receive further and better attention in mitigation of visual impacts on not only Melody Cottage.

Para 5.11.2 The Mendip Bats Special Area of Conservation SPD includes the airport as a ‘foraging area’ for greater and lesser horseshoe bats (Zone B in the Bat Consultation Zone (North Somerset), adopted January 2018). It appears that this document may not have received the requisite attention in respect of this Application. (See also Paras 5.11.7 to 5.11.9 below)

Para 5.13.11 It is understood from earlier airport planning applications that badger setts have been noted to the south of the airport perimeter. Have the badgers been re-settled?

Para 5.11.7 – 5.11.9 sets out bat mitigation plans, but where exactly is the 8ha of new woodland foraging area off-site which appears to have been already agreed with NSC and Natural England? Does this comprise part of the woodland to the west of the airport perimeter which is owned and managed by BAL and which is already regarded as foraging territory within the SPD? If so, then it is not ‘new’ or even further foraging territory, since it is already within Zone B. The bat roost is situated only some 2km to the west of the airport and cannot fail to be affected by the proposals being put forward. This claimed contribution to mitigating the effect on bat foraging areas is therefore no mitigation whatsoever. Suitable replacement foraging areas cannot be established overnight, but take time (sometimes years) to establish and to be effective and must be established and mature prior to any loss of existing foraging habitat.

Appendix D – Section 106 Agreement Suggested Terms. Particularly welcome are the undertakings contained within Paragraphs 7 (b) and 7 (c) which will assist in ridding local communities of car parking problems caused by various nuisance vehicles relating to airport activities. It is however imperative that mitigation measures and commitments to improve services and traffic flows are put in place in timely manner and strict conditions must be adhered to detailed

Planning Consents in future to ensure that no slippage is allowed for 'commercial viability' or any other reasons. The proposals set out however are themselves utterly inadequate and insulting. The airport's proposals on highway works for instance, are little more than 'tweaks' and in themselves will do little to improve the existing situation on the A38 around the airport entrances, which, in the final analysis, are caused principally, if not exclusively, by the airport itself. The problem needs to be addressed holistically and any contribution from the airport by way of Section 106 Agreement forming a small part of the overall plan. The taxpayer will of course, have to pick up the bill for any further works caused by airport traffic increases. (Whatever happened to the accepted business principle of '*the polluter pays*'?) Wider afield, substantial improvements to the A38 will only serve to exacerbate the congestion problems as it is accepted that any roadway improvements attract greater volumes of traffic. A classic example is the M25 motorway around London. A better solution would be to allocate a budget to keep the existing highways in a good state of repair and ring-fence it.

Lighting Assessment – It is noted that in some instances (eg Drawing SE of site 24/09/18 – C-09194) it is stated "Tall trees found in this location block light spill." They will help to block light spill in September when the survey was undertaken, but will be bare of foliage and therefore of little effective use in blocking light spill during winter months, when more artificial lighting will be more widely in use. To be accurate (and therefore acceptable), a survey needs to be repeated when the deciduous trees are not in foliage. In the meantime, it is suggested that the Planning Officer takes a trip past the 'Silver Zone' car park area one winter's evening to see the impact of existing lighting for him/herself.

Cogloop Parking – a full time light level of 800lux immediately below the (formerly temporary) now to become permanent light is far too bright. Accepting that at 20m distant this drops to 0lx, a much lower level would be more invitational to retain foraging bats, for which light levels are critical. (See North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document Adopted January 2018 which recommends a light level of no more than 0.04lux.) Existing hedges and other foraging areas should be retained until any replacement hedges have properly established and are mature in order to comply with the SPD.

The commuting structure and the effect on prey species is acknowledged in the lighting assessment and therefore a proper, full season survey should be conditioned prior to any further intrusion into the commuting/foraging routes to the south of the Cogloop area and a monitoring strategy conditioned to identify any negative effects (Para 8.7 of the SPD).

## AIR QUALITY

### The Environmental Assessment Report (EA) - Wood, Dec 2018.

This EA section on air quality has been compiled and published by Wood on behalf of BAL Dec 2018, and refers to data available before this Government's Air Quality Strategy (Gove January 14th 2019) had been published.

### Considerations for planning applications.

Are we to assume that the criteria used by Wood will remain the same for future modelling of pollution and its effects? Will it demand more relevant placement of '*continuous air quality monitors*' and collection of data using codified baselines for accurate predictions of pollution over a larger area, not just at local ground levels surrounding the site for transport hub development, (ie in Application 18/P/5118/OUT)? Will such an EA contain epidemiological evidence related to spikes reflected in records of local inhabitants' cardiorespiratory history and treatment? Given that critical available MET data, which is historic and independent, is easy to access, this air quality methodology is limited as it is in other respects.

Wood states in its report:

*"It is common practice in Air Quality assessments (except assessments solely focusing on emissions from road traffic) to use five years of met data in order to ensure that the worst-case weather conditions are modelled. However, the nature of airport operations means that emissions are strongly tied to weather conditions, since aircraft normally land and take off into the wind. Given the modeling effort required to consider implications of inter-annual variation in met data, it is not considered to be practical to model emissions with more than a single meteorological year for this assessment."*

Compare that with DEFRA Air Quality Strategy, 2019

*"We are investing £10 million in improving our modeling, data and analytical tools to give a more precise picture of current air quality and the impact of policies on it in the future. We will increase transparency by bringing local and national monitoring data together into a single accessible portal for information on air quality monitoring and modeling, catalyzing public engagement through citizen science."*

So what does Wood's statement about limitation and modeling effort really mean? Inaccurate pollution predictions? What does it mean in this report, when Wood states that the "*2017 met year produces consistently the highest predicted concentrations at most relevant receptors*"?. There are no correlations for flight schedules, day or night, Chapter ratings and emission values or that the summer of 2017 was hotter and dryer than normal, which gives rise to changed pollution characteristics. Site specific monitoring is not the problem. The variables are many, but they exist. Surely the modeling effort is worth the time if there is to be a prediction of the likely effect of a rise in pollution from an increased number of flights from a baseline drawn from 2000 every five years to the present day and if the number of flights serving 8.4 mppa in 2017 is increased to service 12mppa by 2020, a predicted 50% increase in flights and surface traffic, the baseline of 2017 is not satisfactory for the overall impact upon the local communities and environs? Site specific focus of air quality using a base line for one year, 2017, is very limited.

The use of annual mean levels of nitrogen dioxide should surely be replaced by the recording of spikes and median to low levels, which would better reflect traffic flow, congestion, aircraft movements and resultant cumulative emission levels. Furthermore each could easily be done in real time given the software that is available. Air quality monitors should surely be used more widely and in all surrounding residential areas. It would seem from this report that they are minimal, on the ground near the airport. The pollution effects of expansion, monitored in a restrictive manner and area under review in this planning application, may be useful but it cannot give a true reflection of the greater impact of the move from 8.4 mppa to 12 mppa.

There is no mention of the periods of the day when readings are taken or even as mentioned by Copernicus Atmosphere Monitoring Service (CAMS), "*night time peaks of CO<sub>2</sub>, PM<sub>2.5</sub> etc.*" This is of particular relevance if the summer months will have a greater number of night flights due to a relaxation of the current quota restriction.

Copernicus Atmosphere Monitoring Service 2109 states:

*"Near the surface the reason for this diurnal pattern is that the vertical stability of the lowest layer (Planetary Boundary Layer) is higher during the night. This means that the emitted pollutants are trapped (not diluted), which leads to higher concentration values. Horizontal winds tend to be weaker during the night. The pollutants stay closer to the emission hotspots during the night".*

This ought to be analysed when there may up to 3,500 night flights in the summer months if the quota is relaxed. This increased pollution variable should have been recognised. It could then be considered under night time blight by noise and light pollution.

Will Bristol Airport (BAL) be able to respond to real time residential readings using software such as Copernicus Atmosphere Monitoring Service (CAMS), so that residents can be aware when pollutants, either from surface traffic or aircraft reach unsafe levels? A real time App monitor, rather like noise monitoring used around Dublin on smart phones, would make for accountable recording of data and a better interaction tool in the hands of the local community than a desk approach and modeling from an unsatisfactory baseline. It would also eliminate the false assumption that because there are no complaints registered to BAL about the smell of aircraft fuel or traffic fumes on particular days, they do not exist. The complaints system handled by BAL is not easily accessible or adequately dealt with for either noise or for aviation smells. These problems will be raised in the consultative 2050 Green Paper by online consultation by Parish Councils and community groups.

The overriding limitation of this air quality report is that it uses modeling which does indicate moderate to high levels recorded closer to the site but there is nothing to equate expansion with a tangible calculation of reduction in emissions from aircraft and surface traffic, save for mitigation on site. Reference to how reductions in emissions from aircraft in the *Clean Air Strategy 2019* is also scant. A common sense approach would suggest that, even with aspirational use of public transport and BAL's contentious application for parking on Green Belt, emission rates will increase significantly on site and further afield, despite the comment by Wood:

*"Aircraft in the air have a limited impact on ground level pollutant concentrations, with off-airport concentrations being dominated by emissions on the ground being blown horizontally rather than dispersing downwards from aircraft overhead"* (Wood).

One is bound to ask if aircraft emissions at their peak are measured at take-off and particles from rubber on landing, do they remain within the confines of the ground monitors or do they gradually disperse with the westerly winds and collect towards the agglomeration of Bristol? Is it not then that the airport becomes the background pollution source for Bristol, Bath and Weston- super- Mare, once the aircraft climbs into the westerly prevailing winds? There is no recognition of transboundary impacts when the measurements are site specific. The following statement by Wood under '*Predicted Effects and their Significance : 2017 Model Evaluation*', should be compared with the second from DEFRA:

Wood states:

*“Contour plots of modeled annual mean NO<sub>2</sub> concentrations are given in Fig 8.24. These show the contribution from the airfield and from the modelled roads clearly above the background, demonstrating that these contributions fall quickly with distance and reach background levels within a few kilometers of the airfield and within a few hundred meters of roads. They also show that concentrations above 40µgm<sup>3</sup> are confined to the airfield.”* (where the limit value does not apply as there is no long term public exposure very close to the carriageway of the A38 and within the carriageways of Downside Road and Northside Road (where again the limit value does not apply).

Whereas DEFRA states:

*“ air pollution comes from many sources. Pollutants can travel long distances and combine with each other to create different pollutants. Emissions from distant and local sources can build up into high local concentrations of pollution. The UK has set stringent targets to cut emissions by 2020 and 2030.”* (GOVE 2019)

Are we to conclude that any pollution from Bristol Airport will never have an impact anywhere, no matter by how much BAL seeks to expand the transport facility by 2030?

Pollution levels will be compounded on communities by an increase in surface traffic from the M5 South and North, M4 East and West, descending on minor routes to Lulsgate. This was not accounted for in this report. If the ultimate aim of BAL in their Master Plan (unpublished) to become a 20 mppa international airport serving the South West and South Wales materialises, communities will no longer enjoy clean air. The increased surface traffic routing will be beyond the control of the airport (as are the Chapter ratings of aircraft by budget airlines) and therefore Government imposed clean air regulations on Bristol and Bath and perhaps later, many towns and villages, will be unattainable. This will be as a result of an unregulated and ambitious expansion plan by BAL. If the levels recorded as higher than normal in 2017 are the result of 8.4 mppa and there is a trend towards hotter summers, what will the readings at 12 mppa be surrounding the site and further out into communities? The 8.4 mppa to 12 mppa between 2020 and 2030 (the Government's reduction timeline for pollution levels) is the immediate problem contained in this application to break the current cap of 10 mppa. It would be commensurately worse to 2030 and the long term plan for 20mppa by BAL. If the A38 is predicted to cater for the increase in surface traffic without a clear plan to cut emissions within the aspirational clean air strategy timelines, what real pollution levels will the communities along its path suffer? Even if the UK taxpayer were to foot the bill for road improvements, it would not reduce pollution levels. If anything it would create more. This must be carefully considered by the Local Authority.

Westerly windy days are the norm and can be factored in for take-offs or landings. New budget airline fleets with marginally lower emissions are however slow to materialise. That will not be sufficient to reduce emissions, if increased aircraft movements of even 50% negate the minimal improvements in aircraft design within 12 years. What of those damp drizzly windless days when the air is heavy with fumes, due to a take-offs every three minutes in peak times in an 18 hour day? Who measures air quality in communities? Will it be done by an independent body, North Somerset Council or by BAL merely at their site monitors placed comparatively recently?

Returning to the new Air Quality Strategy, Jan 2019, If we accept that the Government's publication of a strategy at this stage is aspirational, with or without legislative powers, it is fitting for NSC first to examine those aspirations, and then to examine how this application by BAL, in the context of such a strategy, fits within timescales and baseline measurements for reducing emissions and improving air quality. In order of priority the areas to be addressed by DEFRA in the published strategy are:

*“Transport, the home, Farming, Industry, clean growth and innovation”.....*

*“Clean air is essential for life, health, the environment and the economy. Government must act to tackle air pollution which shortens lives....*

*“We have already adopted ambitious, **legally-binding international targets to reduce emissions of five of the most damaging air pollutants** (fine particulate matter, ammonia, nitrogen oxides, sulphur dioxide, non-methane volatile organic compounds) by 2020 and 2030. We are proposing tough new goals to cut public exposure to particulate matter pollution, as recommended by the World Health Organization. (DEFRA, Jan 14th 2019).*

These are long overdue ambitions but they must be translated into action plans with legislative powers to enforce. Soft targets have already been in their sights (eg wood burning stoves and farm animals), but firmer warnings have been issued to public bodies in, for example, Bristol. (The Government, the Sec of State for Transport and Sec of State Defra and The Welsh Minister were challenged in the High Court when Mr Justice Garnham found the third air quality plan to be unlawful. (Feb2018)). Have we, in the space of under one year, now got the protection of a fourth lawful plan?

Furthermore it is also ironic that there is conflict between ambitious statements in A Clean Air Strategy 2019, on the right government hand, but in its left hand, support for regional airport expansion (*Baroness Suggs Aviation 2050*

*consultation paper July 2018 to April 2019*). This will weigh heavily on the left hand with a 2020 and 2030 timeline to halve air pollution, yet air travel and resultant road travel is set to treble in the UK. Will both sides be fairly balanced or will economic growth outweigh protection of the nation's health? How will the powers to cut emissions, devolved to local authorities and city councils, pan out, when they also have to deal with the commercial race by regional airports applying for planning permission to expand? The Green Paper 2050 expounds the ideal of sustainable growth and each airport "*making the best use of its existing runway and facilities*". That is not an ideal of sustainable growth for BAL, but rather a clear signal for a race to secure commercial supremacy by breaking its cap of 10mppa at the expense other regional airports. Its ambition is beyond the spirit of the Green Paper to become the largest airport serving the South West and South Wales at the expense of the health of the local and regional inhabitants. Common sense would dictate that the 10mppa cap should remain to allow a catch up for all surface traffic to become electric or bio-fuel powered and electric motors to taxi all planes to their bays or to the take-off point. That would be a real plan for approval within 2020 to 2030 to cut emissions by half within aviation and road transport industries.

BAL bought an airport with a cap of 10 mppa which it has yet to achieve, but it does not have a statutory duty, unlike NSC, to put the health of the inhabitants of North Somerset first above spurious claims of economic prosperity. Economic growth claims are easily dismissed if the latest findings from the Office for National Statistics (3rd quarter) released on Jan 16th 2019 are read. It shows that 24.2 million passengers left the UK with a spend of £16.4 billion. Conversely 10.8 million came in to the UK with a £7.2 billion spend, creating a £9.2 billion deficit spend to the UK economy. BAL's figures produce a more alarming deficit of approx. 6.3 million people leaving via Bristol and only 700,000 tourists coming in to travel the UK (not specifically the South West). According to the Government, if we cut emissions we will save £1.7 billion every year then £5.3 billion every year from 2030. This economic overview does not include the further tax and VAT deficit to the HMRC because of low tax on aircraft fuel and VAT collection or to the personal deficit caused by living near an airport.

The air industry as a whole, its aircraft manufacturers, airlines, are all regulated by IOAC and CAA standards, with vested interests in the industry; the surface transport industry predominantly cars and lorries, which travel to and fro to 40 UK regional airports operated and owned by a handful of private companies. Are they to be a primary target where "*tough new goals to cut public exposure*" (DEFRA) will land? This transport industry is recognized as one of the largest polluters. The Government is seeking to reduce emissions within 13 years, so how will the aspirational actions of government pan out as far as the airline industry is concerned, when local authorities have the responsibility to monitor and try to enforce policy? The UK does not own its airports. Is that why soft targets are first in line for air quality plans?

Who in Government will be responsible for lawful plans that can be enforced on grounds of air quality by planning departments in local authorities, if action is encouraged at local level when an airport applies for permission to expand by breaking its cap? North Somerset Council last undertook an air quality test in 2002/2003 and that was in Banwell and covered only Nitrogen Dioxide pollution, but not Carbon Dioxide, Sulphur Dioxide or Particulate Matter (Banwell AQMA - UK Air Information source). Wood uses a baseline of 2017 which is therefore without foundation, as no independent air quality tests by the local authority have been conducted for 15 years.

In conclusion the following points should surely lead to a refusal of this planning application to break the cap of 10 mppa.

- Air Quality is now of significant national and local importance in protecting the nation's health and every effort should be made at local level to reduce pollution from transport.
- North Somerset Council is charged with its statutory duty to protect its inhabitants' health and monitor air quality. It should pay particular attention to transboundary pollution and its responsibility as a local government body, when discharging its authority in planning. NSC should seriously consider transboundary impacts on Bristol and communities to the east and west and not confine their deliberations to site specific air quality readings closer to Lulsgate found in this EA by Wood.
- The cost of placing more continuous monitors along more roads and in communities which will be impacted to a much higher degree. The cost of epidemiological data collection and treatment of those in a region that already suffers a high national average for Chronic Obstructive Pulmonary Disease (COPD) and asthma.
- Forensic accounting of presumed economic growth and promised job creation of 190 unspecified jobs promised by BAL is not worth the increased costs to the economy through tourist deficit, loss of tax revenue and, most importantly, costs to the NHS and to individuals whose lives may be at greater risk and cut short.
- This planning application ought to be refused on the simple grounds that the cap of 10 mppa has not yet been reached by BAL. To reach that cap will meet the Green Paper's proposition to make best use of runways and facilities, and it will serve the air quality strategy 2019 to protect the nation's health, and furthermore help us meet the still soft legal commitments to climate change.

## DESIGN AND ACCESS STATEMENT

Part 1 – Introduction Para 1.2 claims six design principles, including;

**Sustainability** – “seeking to reduce and mitigate the effect on communities and the environment locally and globally, as well as finding opportunities to deliver enhancement” This Application fails woefully in this respect and shows little concern for reducing effects either locally or globally, but only to enhance the profits of BAL at the expense of others.

**Policy** – “.. maximising development in the Green Belt inset and complying with other relevant policy.” - yet this Application seeks to encroach further into the designated Green Belt which NSC policy claims to be sacrosanct.

Para 1.4 BAL has not complied with its requirement under Planning Application 09/P/1020/OTP to build 2 MSCPs each of five storeys to meet parking demand, but has applied for (and been granted) permission to utilise what was, until recently, agricultural meadowland under Green Belt protection, and is now seeking to gain permission for further Green Belt encroachment to provide low-cost parking. A review of existing charging regimes aimed at attracting better usage of the (already late) MSCPs could impact heavily upon the perceived ‘need’ for further surface parking areas for 2,700 vehicles. Before being allowed incursions into Green Belt agricultural land, BAL should be required to fulfil their obligations under the Conditions attached to the 2009 Planning Application.

Paragraph 5.3.35 of the Planning Statement dismisses further multi-story car parking as having a “*significant visual impact on residential receptors along Downside Road*” as outlined above. However, with a stated south→north slope from the terminal building to the northern boundary of 14.5m, there would appear to be scope to add at least a ‘tier’ of surface car parking over that already in place on the ground level of the north side of the site. BAL are claiming that this is not feasible as the site would then be ‘over-developed’, but to do so would surely be better than using Green Belt meadowland for further surface car parking. Competitively priced, this would surely reduce the demand for expansion of the Silver Zone area still further. The existing south→north slope would also be more than adequate to screen the increase in visual impact of enhancing this facility and would also reduce the impact on the view from Mendip AONB.

Para 3.5 (i) Public Transport and Taxi - States that “*BAL is well-served by an extensive range of frequent and direct bus routes to Bristol, Bath and Weston-super-Mare as well as other large towns and villages. The airport also acts as a hub for local bus routes within North Somerset, where local bus routes from the surrounding villages connect with ‘frequent routes’*” This is a case of looking through rose-tinted glasses, as a glance at the relevant routes and timetables will show! There is a significant shortfall of provision, even no provision on some routes, during night time. The following paragraph states “*Less frequent rural routes do not enter the airport itself, but instead serve stops at Lulsgate Bottom on the A38, which is a short walk from the airport terminal.*” If the airport is so well served and acts as a ‘hub’, why do so many passengers fail to utilise bus transport?

(iv) If BAL was committed to minimising emissions, those internal and frequent buses operating southside (Silver Zone) and northside should be solely electric, thus operating with zero emissions and continuing to be zero emitters as passenger number grow and their need becomes greater.

6.2.4 Refers to the proposed wind turbines on top of the MSCP and referred to also in the Planning Statement Section 3.3.18, but in each case there is a discrepancy between the figures quoted in each document for both the MSCP heights and the Wind Turbine heights of overall 1m. This is not an insignificant difference. Notwithstanding that discrepancy, paragraph 7.3 and Figure 7.6 states that the airport already has plans for “small” (20kWh) turbines to be installed on the roof of the existing MSCP and therefore this would be acceptable. This Council can find no evidence that this aspect has been approved by NSC.

With regard to BAL’s aspiration to extend its operational boundary and free it from the constraints of Green Belt limitations, we would draw attention to NSC’s own Core Strategy CS6 which indicates that NSC does not support any proposed changes to the Green Belt boundary and any move to do so would be robustly opposed.

BAL contends that no further expansion can be accommodated without further car parking, so this Council would suggest:-

- Enforce the previously imposed Planning Condition of completion of the MSCPs prior to any increasing of the cap.
- Parking to be priced competitively and not geared to achieve quickest return on capital
- No further extension of the Cogloop or other car parking within the Green Belt
- Provision of better public transport links
- Projected car parking figures of 22,600 by 2026 is not sustainable on site.

This Council has however, recently also been made aware of an alternative proposal to deal with airport parking off-site, by offering a site close to Junction 21 of the M5 for secure car parking and environmentally friendly passenger transport from that site to the airport and conversely. This offer should be explored, since it will clearly provide solutions to some of the airport’s and the local Council’s current dilemmas relating to increased traffic numbers,

pollution aspects and Green Belt preservation. The site is said to be able to accommodate comfortably 2,700 car spaces which the airport claims will be required and necessitating Phase 2 of the Silver Zone extension into Green Belt land. Added to that will be the saving in carbon emissions around the airport from vehicular traffic numbers increasing. Protection from further stealth moves to take over Green Belt should be a primary aim of the Local Planning Authority as it forms part of North Somerset Council's Core Strategy.

Furthermore, the NPPF (Para 144) states *"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."* In considering this current airport application for expansion, North Somerset Council should be bound to examine the J21 proposal as an alternative solution, as a possible route to reclaiming some of the Green Belt already in use for car parking at the airport site and as a lever to force BAL to fulfil its commitment to build further MSCP spaces set out in the 2009 Application. There will of course be a shortfall in BAL's income stream from car parking as a result, but the environmental benefits must outweigh any monetary factors in reaching a decision, or researching the proposal.

The airport's proposals overall cannot fail to affect all surrounding parishes, whose residents will suffer a loss of quality of life, damage to their environment and increased and constant noise pollution from increased traffic and aircraft movements, which no amount of mitigation can off-set, coupled with deterioration in air quality, together with the complete loss of Green Belt meadowland.

The arguments against increased noise pollution are selective in their evidence, which this Council believes to be fundamentally flawed. Using averaged noise figures obtained from questionably sited receptors is inaccurate and a distortion of reality, unless maximum and minimum noise levels are also taken into account. Needless to say, such figures are not part of BAL's submission, but this Council believes the figures should be available in order to assess accurately the current and forecasted impacts. This is yet another instance of BAL being 'economical with the truth'.

By increasing passenger numbers by 20%, BAL has failed to demonstrate that there is the ability to reduce substantially polluting emissions and greenhouse gases sufficient to have an impact upon climate change and environmental health and well-being of residents within North Somerset and south Bristol. In reality, it is inevitable that there will be increased pollution from vehicles (CO, CO<sub>2</sub>, NO<sub>2</sub> and Particulate Matter) and increased aircraft movements, all of which will have a profound effect on climate change and will more than negate gains in reduction of pollutants being sought and worked hard for by other parts of the Region and the country. In 2017, aviation carbon emissions from BAL were 746.77 kilotonnes of carbon dioxide per year (KtCO<sub>2</sub>/yr) and it is forecast that this will increase by 59% to 1,183.87 KtCO<sub>2</sub>/yr (Environmental Statement Vol.1, Ch.17). For vehicle emissions, in 2017 the figure was 184.45 KtCO<sub>2</sub>/yr whereas in 2026 the baseline figure will have increased by 16% to 214.23 KtCO<sub>2</sub>/yr. (*ibid.*) Should less polluting aircraft not be available by 2026, then it is acknowledged that these figures may be greater.

BAL states that it aims to be carbon neutral by 2030, yet the Application states that the relevant Action Plan to achieve neutrality is *"to be submitted to and approved in writing by the Local Planning Authority 12 months from the date of permission or before the occupation of any new building or completion of any development included in this Application, whichever occurs first."* This tactic denies any meaningful public scrutiny of the Action Plan which, in the opinion of this Council, should constitute an integral part of the outline application. (It is worth pointing out that BAL's own figures for projected carbon emissions are in direct conflict with carbon emission reduction targets of 50% by 2030 set out in the West of England Joint Spatial Plan.) It is elementary chemistry that all pollutant gases, when mixed with water, produce acids, which in turn fall indiscriminately as acid rain with consequent disastrous effects on the environment, public health and bio-diversity (eg Mixing nitrogen dioxide with water produces nitric acid (NO<sub>2</sub> + H<sub>2</sub>O = HNO<sub>3</sub> (Nitric Acid) + hydrogen and mixing carbon dioxide with water produces carbonic acid (CO<sub>2</sub> + H<sub>2</sub>O = H<sub>2</sub>CO<sub>3</sub>)).

Policy CS23 of North Somerset Council's Core Strategy (January 2017) states *'Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact on surrounding communities and surface access infrastructure'*.

BAL fails to appreciate (or chooses to ignore) that climate change is a critical environmental issue and it is generally acknowledged that the world is already at a tipping point which, unless drastic reductions are achieved in the short term, will result in potentially catastrophic changes in the earth's climate as well as catastrophic declines in environmental health. There is no way that these increases can be mitigated sufficiently from the proposals put forward. As a result, approval of this Application will present future generations with an unacceptable legacy, and all for the sake of increasing the so called economic prosperity of the south west region and the airport's owners.

This Council therefore objects in the strongest terms to the proposals for expansion of the airport and recommends that the existing cap of 10mppa be preserved. The airport should not be permitted to spread further or to increase pollution levels further, or to turn further areas of Green Belt agricultural land into car parking spaces. If its capacity is limited within current constraints, there is plenty of room available for expansion at the under-utilised Cardiff airport which is only 1 hour away by car (the airport already claims a proportion of its passengers travel from the South Wales

area) and increasingly attractive an option, even more so now that Severn Bridge tolls have been discontinued. This Council also supports the arguments made and the case put forward by the Parish Councils' Airport Association (PCAA) on behalf of its constituent members.

Footnote:

(BAL has only this week (week commencing January 14 2019) put out its latest Newsletter 'Your Airport' in which it is claimed that the airport produces £2.4bn Gross Value Added to the regional economy and has 5,150 jobs on site. Nowhere does it justify those figures and indeed, our research and that of others indicates the claims are grossly inflated, unsubstantiated and unjustified. If the airport disagrees, why have they not published the basis of these figures to enable them to be verified independently? The airport also claims an input of £380m for the visitor economy, but the ONS figures recently published indicate a visitor deficit prevails (See Para 5.3.62 of the Planning Statement above). The whole 'Newsletter' is open to challenge and is merely designed to present BAL in a manner that is a caring and responsible employer, when clearly the balanced evidence paints a somewhat different picture and leaves a legacy for our children and their children which is unacceptable in any terms.)

Yours faithfully

(via email)  
Fiona Burke  
Clerk

**On behalf of Wrigton Parish Council**