

PLANNING APPLICATION 18/P/5118/OUT BRISTOL AIRPORT

FURTHER COMMENTS FROM WRINGTON PARISH COUNCIL IN RESPONSE TO ADDITIONAL INFORMATION PROVIDED TO NORTH SOMERSET COUNCIL IN SUPPORT OF BRISTOL AIRPORT'S APPLICATION (UNDER REGULATION 25 OF THE TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS, 2017)

CHAPTER 1

1. Wrington Parish Council objected to planning application 18/5118/OUT by Bristol Airport Limited in submissions dated 4th and 21st February and 14th March 2019. It makes this further submission in response to the documentation from Bristol Airport Limited and its consultants which North Somerset Council published on its planning portal on 31st October and 22 November 2019. This submission complements and reinforces this Council's objection to the planning application. It will be set out in three separate documents. This document deals with the economic impact of the planning application. Subsequent documents will deal with the car parking, climate change, ecological, noise and transport implications.
2. In this submission, Bristol Airport Limited is referred to as "BAL"; the report by the New Economics Forum entitled "Evaluating the case for expansion of Bristol Airport" commissioned by the Campaign to Protect Rural England and published on 6 August 2019 as "CPRE Report"; the Department for Transport as "DfT"; North Somerset Council as "NSC"; gross value added as "GVA"; the Review of Economic Impact Assessment – for Bristol Airport Expansion Project by Jacobs prepared for NSC (February 2019) as "the Jacobs Report"; million passengers per annum as "mppa"; Wrington Parish Council as "this Council" or "we"; the final report by York Aviation on the development of Bristol Airport to accommodate 12 mppa per annum: economic impact assessment prepared for BAL (November 2018) as "the York Aviation Report".
3. BAL's planning application is economically flawed, environmentally unsustainable and socially irresponsible.

Economically flawed

4. In the last two years, aviation growth has stalled. Airlines as well as tour operators have come under sustained pressure from falling revenues per seat, rising hedged fuel costs and the grounding of the Boeing 737 Max fleet. Some, like BMI and, most recently, Thomas Cook have gone out of business; some, like Flybe, required major capital injections; even large carriers like EasyJet and Ryanair have seen a sharp decline in their profitability. British Airways and Ryanair have been involved in damaging industrial disputes. Continuing uncertainty over Brexit has suppressed demand for foreign holidays. Businesses rely increasingly on instant face-to-face communication online

rather than time-consuming air travel. Against this background, it is inappropriate and misleading to base future aviation growth assumptions on growth rates achieved after the financial crisis of 2008.

5. These sector-wide weaknesses are compounded by BAL's business model. Bristol is a "leisure" airport. Approximately 60 % of its passengers are international outbound tourists, 13 % are international inbound tourists, 11 % are domestic tourists, a mere 16 % are business passengers. For every pound spent in the UK by foreign visitors flying into Bristol Airport, five pounds are spent by UK tourists flying from Bristol Airport to foreign holiday resorts. This gives rise to a tourist deficit which, in 2017, amounted to £2.4bn. This figure illustrates the extent to which tourist expenditure in the traditional seaside resorts of the South West (including Weston-super-Mare) is being depleted by low-cost holidays in the, mainly Mediterranean, destinations served by Bristol Airport. Rather than supporting the UK economy (including the regional economy of the South West), BAL makes a negative contribution to the UK's balance of payments.
6. BAL's focus on leisure tourism has wider implications. It narrows its airline customer base to low-cost airlines and tour operators. It encourages competition with other regional airports, mainly Cardiff and Exeter, which in aggregate have spare capacity of approximately 7 mppa. BAL is vulnerable to downward pressure on landing fees. It has to yield to mainly cost-driven demands for night flights. BAL also depends to a large extent on non-aviation income streams from shopping mall concessions and on-site car parking, which account for some 60% of its total revenue.
7. Employment at Bristol Airport is largely in low-skill and low-pay jobs that are increasingly being replaced by rapid advances in airport technologies. Any additional employment of this type generated by the proposed expansion is likely to be displaced in the short term. The staff car parking arrangements associated with the proposed expansion are unacceptable to the British Airline Pilots Association. It has objected to BAL's planning application on safety grounds because the time lost in transit from the staff car park to the terminal shortens further the vital rest periods of air crew.
8. It is against this background that this Council has considered the York Aviation Report, the Jacobs Report and the subsequent exchange on the reports between the two firms of consultants. We note with concern that neither report addresses nor, beyond passing references, acknowledges the fundamental economic constraints we identify in paragraphs 4 to 7 of this submission. Both reports ignore that BAL faces two mutually reinforcing challenges: a decline in the foreign leisure tourism that accounts for 60% of its customer base and a business model that depends on surface access by private car by 85% of its passengers. These challenges impose serious constraints on the present size of BAL's operations. They are incompatible with a future expansion of the airport.
9. In their report, York Aviation describe and model BAL's expansion proposals in considerable detail. They present an extensive economic analysis, supported by their own statistical material, for the sole purpose of supporting BAL's expansion to 12 mppa. In their response, Jacobs follow that approach without questioning its validity. While some of their comments are critical, their overall approach is supportive of York Aviation's assessment. We understand that while NSC were Jacobs' clients, BAL paid

their fees. This arrangement may have constrained Jacobs' approach to the York Aviation Report.

10. It is now essential for the protection of the local communities affected by the proposed airport expansion to subject the analysis in the York Aviation Report to detailed scrutiny and fully reasoned critical appraisal. In particular, the far-reaching negative effects of the proposed expansion as well as its impact on the health, well-being and amenity of local communities, almost totally ignored in the York Aviation Report, must be fully identified and explained. The report should be commissioned from independent external consultants appointed and paid by NSC. The report should be published on NSC's planning portal at least six weeks before NSC's Planning and Regulatory Committee decides BAL's planning application to give local communities sufficient time to consider and comment on it.
11. This Council has also considered the CPRE Report. That report does acknowledge the key issues. We agree with its analysis and endorse its conclusions. The CPRE Report leaves no doubt that York Aviation's economic impact assessment in support of the proposed expansion of Bristol Airport is fundamentally flawed. York Aviation overstates by 70% the economic benefits for the wider West of England and South Wales region. They also exaggerate by one third the impact of inbound tourism on the GVA in the South West and South Wales.
12. The York Aviation Report relies to a significant extent on displaced passengers from Cardiff and Exeter airports. For the purpose of calculating the GVA as a result of the proposed expansion, these passengers have been treated as new passengers, thereby boosting the GVA growth. However, for the purpose of calculating the additional carbon emissions resulting from the proposed expansion, these passengers have been treated as existing passengers who would have flown from Cardiff and Exeter airports, thereby reducing to zero the additional carbon emissions. This is a massive contradiction that undermines the credibility of the York Aviation Report. York Aviation's passenger growth assumptions are also incompatible with the DfT model, which forecasts passenger demand at Bristol Airport in 2030 of a mere 8.6 mppa (or 8.5 mppa if there is a third runway at Heathrow Airport) (Department for Transport - UK Aviation Forecasts (Moving Britain Ahead) October 2017).
13. We limit our further comments on the York Aviation Report to the following points:
 - Paragraph 0.6 - The Government's policy paper "Beyond the horizon – The future of UK aviation (Making best use of existing runways)" does not, as the report asserts, support "in particular" the development of Bristol Airport to expand to 12 mppa. However, it does deal with the environmental impact of airport expansion and emphasises the role of local planning authorities in airport planning proposals. We refer NSC especially to the highlighted paragraph 1.29.
 - Paragraph 0.14 - York Aviation tries to obscure the tourist deficit generated by Bristol Airport by reference to the "substitutability" of UK airports. In reality, the tourist deficit is capable of precise quantification by reference to data available from the Office for National Statistics International Passenger Survey.

- Paragraph 0.15 – The additional GVA that would result from infrastructure construction to enable an expansion to 12 mppa has not been substantiated.
- Paragraph 0.18 - The statement that the largest single socioeconomic benefit of the proposed expansion is from air fare savings is not only a reflection on the weakness of BAL's business model; it also illustrates further the extraordinary discrepancy between the benefit and burden of the proposed expansion.
- Paragraph 0.19 - The prediction that the net present value of a 2 mppa expansion amounts to around £1.6 billion over 60 years is astonishing. In the current economic climate, it is difficult to predict even short-term outcomes.
- Paragraphs 0.20 to 0.22, 7.2 to 7.6 - The claims in these paragraphs are unsubstantiated. BAL should identify the deprived areas in South Bristol and Weston-super-Mare and disclose the total number of its employees from these areas, their percentage share of BAL's payroll and any budgeted increase in their number.
- Paragraph 1.6 - BAL proposes to build another multi-storey car park. However, at a meeting of a working party of the Bristol Airport Consultative Committee on 3 October 2019, a BAL executive disclosed that BAL would not build the multi-storey car park approved under the 2009 planning permission because it could not justify the capital expenditure.
- Paragraph 1.8 and Annex A - We note that while BAL considered it appropriate to consult local authorities as far away as Plymouth City Council on its expansion plans, it made no attempt to consult this Council. We remind NSC that Bristol Airport is located entirely within the Wrington parish boundaries.
- Paragraph 3.33 - The economic development targets listed in this paragraph are largely incompatible with the operation of a leisure focussed airport. Bristol Airport is not, and on the basis of its business model never will be, a logistics hub or a catalyst for a business park or high value inward investment.
- Paragraph 3.79 - In the light of this submission, we emphatically reject the conclusion that "The economic strategy and planning policy relating to the airport is clearly supportive of airport growth and in particular development of Bristol Airport to expand to 12 mppa is clearly supported by the Government's Making best use of Existing Capacity policy paper."

Environmentally unsustainable

14. On 24 September 2019 Lord Deben, the chairman of the Committee on Climate Change, issued a further report to the Secretary of State for Transport. In his report, Lord Deben concludes that, in order to meet its carbon reduction targets, the Government has to limit aviation demand growth in the UK to "at most 25% above current levels" and that "current planned additional airport capacity in London is likely to leave at most very limited growth at non-London airports". There can be no doubt that passenger growth at Bristol Airport beyond the current limit of 10 mppa would be incompatible with the analysis set out in the report. Even growth from the current level of 8.6 mppa, already

in excess of the Department for Transport's projection of 8.5 mppa, to 10 mppa may become untenable under the report.

15. The proposed expansion will inevitably result in a sharp increase of as much as 50% in carbon emissions from aircraft as well as surface access traffic by private cars (Adrian Gibbs, Just plane wrong: Bristol Airport's expansion application, 12 July 2019). BAL has no realistic prospect of mitigating the adverse environmental effects of a 50% increase in passenger numbers. It lacks the economic bargaining power to require its airline customers to operate larger, quieter and more fuel-efficient aircraft. The airlines take their own, economically driven, decisions about fleet sizes and the type and mix of aircraft. In this context, Mott MacDonald's assertion in their letter of 23 May 2019 that night flying restrictions encourage BAL's airline customers to deploy their newest and quietest aircraft is unfounded.
16. The A38, A370, roads connecting them and B roads and lanes leading to the airport are already congested with existing volumes of traffic. Increasing these volumes by 50% will make the congestion significantly worse. BAL has the fundamental problem that some 85% of its passengers travel to the airport in their private cars. This is the worst transport modal split for any major airport in the United Kingdom. Bristol is also the only major UK airport that is not accessible on a dual carriage way or motorway. The road improvement measures proposed by BAL in their planning application would do very little to ease existing congestion. They would have no effect at all on the substantial increase in road traffic volumes envisaged under the planning application.
17. BAL is in no position to address these problems. Its business model depends on substantial revenues from low-cost passenger car parking in the Green Belt. It therefore has a vested interest in maintaining the current distribution of access traffic between private cars and public transport. The location of the airport as well as the surrounding topography would make the substantial access road improvements necessary to ease the congestion time consuming and expensive. It does not make economic sense for BAL to fund these improvements.

Socially irresponsible

18. The current air and noise pollution from Bristol Airport already has a major adverse effect on the health and well-being of the communities affected by it. Night flights are a blight on overflown communities. They have a seriously adverse effect on the health of people exposed to them, especially the young. There is also, in relation to night flights, an unacceptable imbalance between the economic benefits, which accrue mainly to BAL and its low-cost airline customers, and the health and social burden, which falls indiscriminately on the overflown communities. BAL proposes to increase the density of night flights during the summer months when it is especially important to be able to keep windows open at night. Night flights in general, and an increase in their density in particular, are wholly unacceptable to local communities. Supporting them would have a lasting corrosive effect on the relationship between NSC and its citizens.
19. The expansion of the airport in recent years, under the previous planning permission of 2009, has given rise to a significant increase in anti-social behaviour. Typical examples are "rat runs" to and from the airport, illicit car parking by air passengers on narrow

village streets and on Felton Common, speeding on country lanes, derelict properties near the airport, littered and churned up verges and laybys on airport approach roads. BAL has taken no effective measures to curb these behaviours. The policing of the airport does not go beyond the immediate environment of the airport perimeter.

20. There is a major discrepancy between the benefits and the burden of the proposed airport expansion. The benefits, to a large extent, would accrue abroad. The tourist economies of the destination countries would receive a further stimulus; to the extent that BAL is profitable, its Ontario owners would receive higher returns. The burden would fall almost entirely on local communities. And it would hit them hard, through ill-health (especially for the young and the elderly), loss of amenity and tranquillity, traffic chaos, environmental degradation and declining house prices.

NSC's Decision

21. NSC has to consider BAL's planning application in accordance with all applicable planning and environmental laws, its core strategy and relevant plans as well as aviation-related policy and guidance. In doing so, it has to act properly, reasonably and rationally, taking into account relevant and disregarding irrelevant factors. Here, it would be irrational to raise Bristol Airport's capacity from 10 mppa to 12 mppa when current DfT demand forecasts are at 8.5 or 8.6 mppa even before the inevitable downward revision in response to the report of the Committee on Climate Change of 24 September 2019.
22. Relevant factors include the full range of economic, ecological, environmental, health, land use and transport issues in the specific context of civil aviation. Each relevant factor has to be given appropriate weight in the light of planning policy and guidance. Expert opinions, whether they support an approval or a rejection of the planning application, have to be critically assessed. To the extent that they are flawed or inherently contradictory, like the York Aviation Report in relation to the displacement of gross value added, they should be disregarded or given significantly lower weight.
23. There is no national or local planning policy to support foreign economies. It follows that increasing the gross value added in Mediterranean tourist regions and in Canada is not a relevant factor NSC can take into account. If it were to do so, NSC would exercise its discretion as local planning authority irrationally and unreasonably.
24. The economic benefit for the South West is a relevant factor. However, that benefit is limited to a small and transient increase in low-skill and low-pay employment, a small increase in shopping mall turnover and a slim chance of a marginal increase in inbound tourist expenditure. This benefit has to be set against the burden for local communities. That burden, which is already immense, would be substantially increased in every respect. It would be wholly disproportionate, as well as unreasonable, to give the very limited benefit greater weight than the exceptionally onerous burden. It follows NSC cannot lawfully approve BAL's planning application. It has to be rejected.

CHAPTER 2

Noise – (Section 6)

Environmental noise is an important public health issue, featuring among the top environmental risks to health. It has negative impacts on human health and well-being and is a growing concern among the general public. From this point of view it is important that the impacts on noise arising from this proposed development are given the appropriate level of scrutiny, reflecting the importance of health in the community.

From an economic point of view, the exclusion of webTAG data (which allows the financial impact of the adverse effects of noise to be evaluated) has been made on the basis that any changes in noise due to the development are negligible. However this approach fails to recognise the existing financial impact and burden to the local communities without any further development. Any evaluated economic benefits of operating the airport to date should be reported inclusive of this cost to provide a full picture of the overall benefits or dis-benefits.

The noise mapping calculations are lacking in details that would allow an improved understanding of the basis upon which they have been carried out. Recognising that different calculations have been made to reflect the changing aircraft movements during a typical day, have the early morning departures been adjusted to reflect their full fuel load? Equally what vertical flight profiles / engine thrust assumptions have been used for the noise mapping analysis? Both of these aspects have been found in other CAA studies to have the potential to change the results and better match the noise measurements.

The Noise Preferential Routes (NPRs) are another important aspect of the noise mapping carried out. It is not clear whether the NPRs or the actual aircraft movements have been used in the noise analysis. Similarly, from a seasonal point of view it is widely acknowledged that warmer summer temperatures reduce aircraft height compared with other times of the year, so that they are either closer to the ground during take-off / landing, or they require more engine thrust to maintain higher altitudes. Again any assumptions made regarding this aspect have not been identified in the document.

Equally in terms of the assumptions made for the aircraft fleets that use the airport and are part of the noise calculations, what is the source of the aircraft noise emissions used in the noise mapping? (it is noted in the EASA aircraft noise database that the noise measured from aircraft landing is significantly greater than that from take-off. Is this observed by the airport? Why are no noise penalties imposed for landings and only take off?). Similarly, the community at large will be pleased to see the introduction of new aircraft with noise reductions, however what decibel level of noise reduction has been assumed in the analysis per aircraft that is modernised? How has it been introduced into the analyses? It remains a real possibility that the assumed fleet renewals will not take place and may be delayed, hence it would be informative to perform and report on a sensitivity analysis that considers operation in 2026 without the benefit of fleet modernisation to understand the impact of this.

The noise measurements mentioned in the proposal are a positive aspect that seem to have been sidelined; they would provide an excellent opportunity to validate the noise mapping

results presented. It is noted that BAL have three permanent noise measurement sites and portable equipment that has been used regularly (what training have the airport staff that carry out the portable noise measurements had? How often is the portable monitoring equipment calibrated?).

Additionally, separate noise surveys have been carried out in March 2018 as part of the planning application. Are there plans to carry out similar measurements during the summer months to allow a proper comparison with the analysis results and planning conditions?

Regardless of the equipment used, the measurement of aircraft noise in itself is not a straight forward activity, and again, there is a lack of detail to understand the approach used. How are the measured noise levels (SELs) matched to aircraft operations by the Noise Track Keeping system? What proportions of measurements are typically discarded? There is also scope to provide a financial incentive for aircraft operators to renew their fleets by reducing the thresholds for noise and air pollution that BAL monitor. Over the last two years no fines have been imposed, perhaps a reflection that these levels need to be reduced.

From Table 7.32 it can be clearly seen that the assumptions around the operation of the airport and the fleet in 2026 (12mppa) offer a beneficial position to that of the current time (2017). Since the number of flights is increasing, the benefit is acknowledged as solely due to the assumed reduction in individual aircraft noise emissions (noting that the magnitude of this reduction and how it has been introduced into the analysis has not been clarified). Taking this at face value, it would be reasonable to assume that the reduction in individual aircraft noise emissions that are beneficial during daytime will also be of benefit in the night-time, especially since the total number of night flights remains capped at 4,000. However the results presented in Table 7.33 do not reflect this (the noise increases) and no explanation is provided. This increase in noise for night-time is recognised by the authors (7.10.53 “this is a potentially significant adverse effect”) however this has been omitted from the conclusions. Equally the number of properties affected seems to be underestimated, given that Figure 7D.25 shows that the complete villages of Wrington, Congresbury, Yatton and Cleeve are within the night-time 45dBA LOAEL. In a similar manner Table 7.36 shows that the number of properties affected by a SEL of 90dBA increases, rather than decreases between 2017 and 2021, which is inconsistent, perhaps indicating a problem with the analyses carried out? (see also Figures 7D.8, 13, 25, 36 and 39 which have odd island contours, and Figures 7D.42, 44, 50 and 52 which have the new B738 Max noisier than the current B738)

Although it is not claimed to be an airspace change proposal, it should be clear that as it stands this document falls short of the requirements of CAP 1616a and supplementary analysis and evidence is required, on top of the comments provided here.

The zones of influence for road traffic noise rather neglects the fact that the road traffic noise does not stop at the arbitrary boundary selected for the assessment; the road traffic travels along many of these roads in order to arrive (or depart) from the airport. Hence there are likely to be a far larger number of properties that are affected by road traffic noise arising from the proposed airport development than that assessed.

It is understood that this document has been prepared in line with the policy requirements, however it is considered a missed opportunity to acknowledge and evaluate the 'aspirational' WHO guidelines. The WHO guideline values are evidence-based public health oriented recommendations, generated using four guiding principles: Reduce exposure to noise, whilst conserving quiet areas; Promote interventions to reduce exposure to noise and improve health; Coordinate approaches to control noise sources and other environmental health risks; Inform and involve communities potentially affected by a change in noise exposure. The scientific evidence reviewed and summarised in the WHO guidelines implies that health outcomes can be quantified in a health risk assessment, and that their effects are cumulative. From aircraft noise this includes annoyance, reading and oral comprehension in children, sleep disturbance and potentially change in waist circumference and incidence of ischaemic heart disease. These health risks and burdens are already being borne by the community, and are in no way transferred to the owners of BAL.

CHAPTER 3

Car Parking (Section 2)

Figure 7 suggests/forecasts an increase from max. 10,900 spaces (2019) to 15,600 spaces (2026) – an increase of 69%. The Airport (BA) calculates off-site parking to be some 4,000 spaces in December 2019 and 4,700 in December 2026 and indicates that increased provision is therefore required to overcome the temptation to park off-site. Presumably this will be met by North Somerset Council (NSC) sacrificing yet more Green Belt land so that the airport can increase its income stream from parking fees yet further. It is noble of BA to wish to draw parkers away from off-site facilities, some of which are also in Green Belt land, but it can only be done by sacrificing more Green Belt land for surface parking. The value of Green Belt is being undermined and undervalued and this strategy is far from being in the best interests of the resident population or the environmental benefit of Green Belt land. In the light of recent research forecasting a downturn in consumer travel by air, this strategy should be rejected in favour of a more sustainable use of public transport and is a very sound reason not to permit any increase in the cap for the time being.

All reasoning for increased car parking availability is predicated on BA increasing its cap from 10mppa to 12mppa (and further). This argument is unreasonable. Nowhere does it calculate demand if the cap remains at 10mppa. Changes in peak and winter demands are therefore not representative of the present cap, nor does it allow for the promised (and earlier conditioned) increased provision afforded by completion of the overdue multi-storey car parking facilities (MSCPs). Fig. 12 shows no change or increase in the provision of BA's other car parks (presumably the MSCPs). It is understood that premium costs are incurred for use of the MSCP facilities and that in turn renders them less attractive to cost conscious customers. BA have admitted in earlier documents that MSCPs are often not at capacity and use that argument to defer building further promised provision, but ignore the fact that, unless they are competitively priced, then they will remain under-utilised. It is simple economics which a child could understand!

This whole scenario is to accommodate very significant increases in car traffic which equates to increased pollution and further incursion into Green Belt land, (which is supposed to be protected under NSC's Core Strategy). If no further expansion of passenger numbers

beyond the current 10mppa were to be permitted, then there would be no further incursions into Green Belt and no further increases in vehicular pollution, coupled with no further loss of car parking space caused by construction projects to meet the 12mppa demand. That is a scenario which would be more compliant with NSC's avowed intentions on carbon neutrality targets and reflect a more caring approach by BA.

As things stand at present, BA is attempting to demonstrate how, by increasing on-site (in Green Belt) parking, it can alleviate pressure on off-site parking in the Green Belt. It is very obviously price which attracts customers to off-site parking, not lack of availability, since off-site car parking takes place even when BA's parking facilities are not fully used. Trading one piece of Green Belt for another of the same is the aim, but it is BA's owners (The Ontario Teachers' Pension Fund!) who benefit from BA's bottom line; there is no benefit accruing to the host community. There is a significant gulf between cost/benefit here.

The expansion aspirations of BA do not create the "very special circumstances" which need to be demonstrated to consider loss of Green Belt land, nor has there been any serious or apparent consideration to provision of off-site parking facilities elsewhere – indeed the 'Mead' application for a facility close to Jct 21 of the M5 has been strongly opposed by BA, presumably because of the perceived effect on their bottom line profits.

Climate Change (Section 3)

A Carbon Climate Change Action Plan (CCCAP) should be drawn up BEFORE any consent is granted, not afterwards, and should indicate in precise terms how any impacts are to be dealt with or ameliorated. Local population and the impacts upon them must always be the most important (a view expounded and supported by NSC's Core Strategy) factors and if climate emergency targets are to be met, NSC must first be satisfied that proposals are adequate and have a positive effect in reducing current levels of, for instance, carbon dioxide, nitrogen dioxide and noise as well as other related issues.

The headings of the proposed CCCAP are aspirational and imprecise. What precisely is a "*regional leader in carbon management*"? This is too woolly and is not measurable. We all have "*an aspiration for carbon neutral growth of aircraft emissions*" but carbon offsetting only kicks the can down the road to someone else's back yard! "*will seek to reduce carbon emissions relating to surface access through the Airport Surface Access Strategy (ASAS) and Workforce Travel Plan.*" This sounds good but is actually not setting a target to be met, (and measured) but merely stating an aspiration. It is therefore valueless in reducing carbon emissions *per se*.

As carbon commitment targets they are too indefinite and too difficult to measure and to interpret meaningfully. Targets need to be transparent to all, definitive and measurable, not '*hope to*' or '*aspire to*' which are neither.

Table 3.1 The scope needs to be widened to include (a) car hire activities and resultant pollutants, (b) car park handling (eg in Silver Zone valet parking), (c) private plane and helicopter activities and (d) associated activities such as fire service, shops and other retail outlets on site, including food outlets which, between them, probably generate more Greenhouse Gas Emissions than the 'direct' activities of BA.

In view of government's lack of a coherent and definitive policy on aviation, and recent consultations which are designed to inform a more relevant policy in line with the declared Climate Change Emergency, there is a strong argument in support of a total moratorium on aviation expansion and airport growth until such time as a definitive policy is adopted by government.

Ecology (Section 4)

Notwithstanding the further information provided, including the response to Natural England and NSC, it appears from the objections submitted by Avon Wildlife Trust that they remain dissatisfied with the proposals and responses produced by Johns Associates, to concerns raised by Natural England.

It is difficult for this Council to understand how local ecology can remain undamaged by the proposed expansions in aircraft and airport traffic in terms of emissions by increased aircraft flights contributing more carbon dioxide (CO₂), noise and intrusion into designated Green Belt land, as well as increased ground traffic from users of the airport by private, commercial and public transport.

Once the damage is done, reparation takes a very long time to recompense those affected species and common sense would therefore advocate extreme caution be exercised in agreeing to unproven, so-called mitigation methods. This Council therefore remains in the 'object' camp, alongside Avon Wildlife Trust.

It is also timely and appropriate to draw attention to the results of studies released 25 November 2019 by the United Nations' Environmental Programme's (UNEP) Annual Emissions Gap Report which indicate that worldwide CO₂ emissions are now at an all-time record high despite efforts to curtail emissions to date, which are proving totally inadequate. In order to be effective, emissions must be reduced from current levels by a minimum of 7.6% every year in the next decade. This days before the climate summit is due to be convened in Madrid.

Economic Impact Assessment (Section 5)

This Council remains unconvinced of the economic benefits which are promulgated as accruing to the local economy from any expansion of BA's activities, and would reiterate that, from figures produced by the Office for National Statistics (referred to in our earlier objections in this respect) indicate a 'tourist deficit' economically. Additionally, any operating profits from BA's activities accrues not to the local economy, but to BA's Canadian owners and even more importantly, profits stem principally from income received from car parking. Promises of job opportunities offered by BA have never been realised in the past, so the figures now put forward must be highly questionable and without foundation in fact.

Unfortunately, it is the local economy and environment which has to bear the adverse impacts of all forms of pollution from BA's activities whilst Canada gleans the benefits and profits. This makes no economic sense for North Somerset whichever way the argument is skewed.

BA comments that expanding operations will overcome the need for passengers to travel to London airports and thereby reduce vehicular emissions, but chooses to ignore emissions produced by, for instance, passengers from South Wales who travel cross-country by private car to BA. Interestingly, Table 8.2 of the 'Transport Assessment – Supplementary Document' indicates very clearly the regions from which BA's passengers travel and includes 100,000 plus coming to BA from the south-east of England and a total of approximately 500,000 emanating from outside the south-west and South Wales, which rather confounds BA's argument that their growth will bring about a reduction in pollution. (Please note also our comment under Para 3 of Part 5 under the heading of 'Transport – Section 7 below.)

In order to support an increase in passenger numbers, there would need to be major infrastructure investment in North Somerset which would be hugely detrimental to the area's rurality and its appeal as an area of relative tranquillity, with substantial amenity value, including large areas of 'protected' Green Belt land, SSSIs and a large AONB on its doorstep.

This Council calls into question the veracity of Table 8.14, which also fails to indicate whether the employees are directly or indirectly employed by BA and not its franchisees or airline operators.

This aspect is considered in more depth in Chapter 1 of this document.

Noise (Section 6)

It is interesting that Table 1 shows the split of noise creators, but shows a constancy in the areas of 'Road' and 'Ground' 2017/26, but it is difficult to reconcile those predicted levels in the light of the proposed increases in car parking demand and the proposed aspirations to upgrade the A38 and other access routes indicated in Section 2. Words and figures differ.

It appears that all the decibel levels quoted cumulative represent and reflect average levels, whereas to those affected, peak levels are equally if not more important. Average levels, it would appear, include 'inactive' periods when quiet can be appreciated by those affected. Particularly during night time, peaks are intrusive and threatening to health and well-being, which should be protected and a paramount consideration by NSC, according to its own Core Strategy. In addition, no account has been taken of the emerging proposals for the redesign of airspace in the south west of England, the impact of which will be felt by more rural communities in our region. Furthermore, the local authorities (including NSC) are inhibited in their decision making by the current lack of a cohesive policy on air travel, its management and effects, though a Green Paper is expected in Spring 2020. Any decision should therefore be withheld until that policy is clarified by government.

Unfortunately it appears that Boeing's 737Max aircraft will not be in operational service within the timescales predicted by BA and that noise mitigation/amelioration from aircraft will not be effective as predicted. A re-assessment is therefore now required. Please also see the comments contained in Chapter 2 of this submission.

Transport (Section 7)

Table 1 (Predicted total hourly person and public transport trip generation) presumably includes those using taxis as well as buses for transport, as there would appear to be more people using public transport than capacity on the buses can provide at some of the time-slots covered. Peak periods indicate only 14% of inbounds use public transport, which is less than BA are claiming the modal share is now.

Part 4. The A38/A368 junction capacity tests indicate no need to increase its capacity in order to cope with 2026 levels (Section 3 – Junction Capacity Assessment Results). However the analysis does not take into account the proposed new motorway junction, the proposed Banwell By-Pass or the proposed impact of commuters emanating from the the so-called ‘Garden Villages’ put forward by NSC and the cumulative effects upon the A38, A368 and potentially the A370 also.

Part 5. It remains clear that passenger demand outstrips supply in terms of airport parking capacity, which results in continuing loss of, or adverse impact and erosion of the area’s Green Belt land. Public transport (including taxis) provision remains poor, which is exacerbated by BA’s failure to (a) provide, as promised, an integrated transport hub and (b) BA’s failure to build the conditioned multi-storey car parking facilities. BA claims that passenger demand is for low cost car parking, which is itself unsurprising, but continued incursion into the Green Belt leaves local communities bearing the downsides whereas BA scoops the cream. This must not be allowed to continue and BA needs to review its car parking strategy and its pricing policies better to match passenger demand.

Figures shown in Table 8.1 do not appear to correspond with those shown in Table 8.3. Please explain this dichotomy.

With BA reaching its capacity in environmental terms, it makes better sense to develop Rhoose Cardiff International Airport and Exeter Airport to accommodate projected increases in demand from the south west of England and South Wales which would spread the load more evenly, prevent unwanted and inappropriate expansion at BA and aid the reduction of carbon emissions from passengers currently travelling from those regions to BA.

The various charts relating to perceived highways impacts appear, in themselves, to give sufficient grounds to indicate the non-viability of BA’s expansion plans. If the airport’s expansionist aspirations are met, then the consequential impacts upon the area of North Somerset would bring about the most adverse and damaging impacts upon both the health and the well-being of all its communities with little or no incremental benefit.

Once again, you are referred to Chapter 1 for a more detailed analysis and critique.

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