

Expansion of Bristol Airport to 12mppa

PINS Ref APP/D0121/W/20/3259234

Planning Application Ref: 18/P/5118/OUT

Rebuttal Proof of Evidence for PCAA

Hilary Burn

PCAA Rebuttal for Bristol Airport Inquiry - Hilary Burn

PCAA comments on BAL's Proofs of Evidence are shown below.

Note: The PCAA continue to seek a dismissal of the Appeal.

1. Air Transport Movements

- a. The figures stated in BAL's Proofs of Evidence (Air Traffic Forecasts and Planning for Commercial Air Transport Movements (atm)) are 75,340¹ commercial atm and for positioning and other movements 10,600 atm. The 'Planning' proof point 3.4.5 gives no room for uncertainty in the commercial movements as it states *"There will be a total of 75,340 annual commercial air transport movements at 12 mppa (2030 in the Core Case)"*. We note that in other documents such as CD2.21 point 4.8 the word 'approximately' was used. We believe that the uncertainty in future atm has been removed and therefore, this figure should now be set as a cap by way of a Condition. This would alleviate some of the concerns of local residents.
- b. We note that the commercial atm has reduced throughout the application period from 97,393 atm in 2018 (CD2.3) to 75,500 atm in 2020 (CD.21) and 75,340 atm in 2021 as shown above. This is a considerable drop in movements. We want residents to be protected from increased movements and noise; they will want to be certain that projections put forward are not simply based on a best case scenario in order to facilitate the planning application.

2. Night flights

- a. All the relevant BAL documents submitted to the Inquiry, including the Planning proof point 3.4.5, state that the *'demand for early morning and late evening movements in the summer period is expected to grow'*. Noise at night under growth to 10 mppa is currently governed by a noise quota point system and also a winter and summer movement limit between in period 23.30 – 0600 We take issue with the Noise proof point 5.3.3. It is simply not correct to state that night movements are only governed by the noise quota point system. The current winter and summer limits, as highlighted in all our submissions, protect residents from having even more night flights in the summer months. We have described elsewhere how the level of night noise under 10 mppa is already intolerable during the summer months. A reduction in flights from 23.30 – 06.00 is required.

3. Noise Mitigation

- a. The Planning proof point 3.5.21 concerning Noise, states that the *"noise insulation scheme goes beyond both the requirements of the APF and the recommendations contained in Aviation 2050"*. The PCAA note that noise as a negative externality remains uncoded when set against the benefits claimed by

BAL. Furthermore, the mitigation proposed is inadequate and not in line with the Treasury Green Book as referred to in our submission CD17.1 Appendix 8.

4. Transport Modal Split

- a. The PCAA believes that there is some confusion within the Transport section in respect of the modal split. It has become impossible for the lay person to understand the figures provided for the transport and parking studies with figures consistently changing throughout the application process. The modal split target for 10 mppa was 15% and this was changed to a target of 17.5% for the 12mppa case (applied to the 3.4mppa uplift from 2018 base). Now the 2019 data has become available from the CAA which shows a split of 21.8%, highlighted in the BAL Transport proof. If the CAA modal split of 21.8% is reliable, we would expect a higher target of 30% to be set to ensure continuous improvements in sustainable transport, as policy dictates under the NPPF. That said, we are suspicious of the data that has been presented and fear that these may not be like-for-like comparisons.
- b. The Parking Demand Study in 2018 was based on a modal share of 12.5% and the November 2020 Update to the Parking Demand Study was based on a modal share of 17.5%. This Study has not been updated in line with the new CAA data. To allow a correct understanding of car parking need, a new assessment should be carried out reflecting the CAA modal share of 21.8% with an uplift of preferably 8%. This will support our view that car parking on the Silver Zone Extension 2 should not be granted because, with the higher modal share, parking demand will be reduced.
- c. Note that even under a modal split of nearly 22% junctions close to the airport, such as West Lane and Downside are at capacity. We highlight the A38 Major Road Network consultation⁴ which states *'Past traffic flows have shown that there is insufficient capacity at the Downside Road junction to accommodate road users prior to Covid-19, at which time Bristol Airport was operating under their current maximum passenger capacity'*. The PCAA expect that, even with an increased modal share of 30%, the congestion surrounding the Airport will remain and cause other pinch points, for example at Churchill traffic Lights and Brockley Combe traffic lights on the A370. Delays will remain not only to passengers but also to residents because of the unsuitable surface infrastructure and the topography surrounding the Airport. There is no mention of the proposed mass transit which may resolve the road network to the Airport.
- d. The PCAA notes that the Clean Air Zone will bring a modest increase of traffic to our local roads. Witness statements from parishes show that any further increase in traffic on local roads will increase congestion and impact residents.

5. Public Transport Interchange (PTI)

- a. The PCAA notes that there is no comment within proofs on the timing for delivery of the PTI which is an essential requirement to deliver of the increased modal share under growth to both 10 and 12 mppa. It is also a requirement for communities, particularly from the Chew Valley and South of the Airport, to access public transport to Bristol, Bath and elsewhere. Likewise no comment has been made on the timing of MSCP 2 which will be required for car parking necessary for residents to use the PTI.

6. A38 Highway Improvements – A38 MRN Consultation

- a. The A38 MRN consultation commenced on 21 June. Although only a consultation, it recognises that junctions along the A38 are at capacity and frequently have congestion. This capacity issue is caused by the airport with its current (ignoring pandemic) surface access and passenger numbers of 8.6 mppa in 2018. This is recognised in the consultation. It, therefore, stands to reason that as the airport's suggestions for improvements are similar they are not actually fit for purpose for a raise in 3.4mppa passenger growth to 12 mppa predicted in 2030. No mass transit or rail is expected in the timeframe of growth to 12 mppa.

References

- 1 Proof of Evidence Air Traffic Forecasts point 3.4.10 and Planning proof point 3.4.25
2. CD2.21 Passenger Traffic Forecasts for Bristol Airport to Inform the Proposed Development to 12 mppa
3. CD2.3 Planning Statement point 2.6.9
4. A38 Major Road Network Scheme <https://a38mrn-engagement.com/>