

**Applicant: Bristol Airport Limited (majority owned by Ontario Teachers' Pension Plan, Canada)**

**Application 20/P/2896/APPCON- addendum to Environmental Statement and associated documents by Bristol Airport Limited in relation to its appeal against the decision of North Somerset Council on 13.3.2020 to refuse planning application 18/P/5118/OUT**

**Submission to North Somerset Council**

**By the Parish Councils Airport Association**

**January 2021**

This submission is based on detailed examination of some of the documents referred to in the Addendum to the Environmental Statement and associated documents . The Parish Councils Airport Association (PCAA) is a group of elected representatives from 26 parishes and one town which represent the local community interests. We cover a large area with parishes from Sedgemoor district, Bath and North East Somerset district as well as North Somerset district. The parishes the association represents are Barrow Gurney, Blagdon, Brockley, Burrington, Butcombe, Churchill, Cleeve, Dundry, Kingston Seymour, Long Ashton, Winford, Wraxall and Failand, Wrington (North Somerset) Chew Magna, Chew Stoke, Compton Dando, Compton Martin, Keynsham Town Council, Nempnett Thrubwell, Newton St Loe, Publow w Pensford, Stowey Sutton, Timsbury, Ubley (BANES), Shipham (Sedgemoor). The population within the Association equates to over 40,000 residents.

The purpose of the PCAA is to advise and represent its member councils on matters affecting them which are connected with Bristol airport and its operations. It reports back to, and reflects the views of, some 25 parish councils and one town council which, in turn, are responsive to the views of many thousands of electors. We do not have the resources to run a media campaign or seek costly expert advice from consultants in various fields.

This response document has been compiled entirely by local volunteers from within the communities affected by the airport and working to a tight timescale over the Christmas period. Layout, consistency, style and language may not be the same as in a report commissioned from an expert or a professional business. There is some duplication but this and other inadequacies are mostly the result of needing to respond within such a short timescale. We trust, however, that you will look beyond any shortcomings of this nature and recognise the depth of concern that exists amongst local communities, voters and council tax payers. All figures and statistics used in this document are from Bristol Airport or documents that relate to local and government policy papers and reports. Other papers are referenced

### **The PCAA continues to object to this application**

Our response is to the Addendum to the Environmental Statement and associated documents produced by Bristol Airport Limited (BAL). Our original, core submission to application 18/P/5118/OUT is submitted in a separate, companion document along with its own appendices and all other documents submitted to NSC subsequent to the core submission.

**Recovery** - The PCAA are very aware that at any time from the commencement of the Appeal the Secretary of State at the Department of Transport and/or Department of Housing, Communities and Local Government can recover the Appeal. It is our view that the Inspectorate should make the decision on this application and we welcome a full examination of the application. On 1 September 2020, Dr Fox MP for

the constituency in which the airport is located, wrote to the Secretary of State for Transport on the matter of Recovery supporting the views of parishes that the Appeal should not be recovered. The letter is Appendix A.

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# 1. Executive Summary

- 1.1. Our arguments are shown in a very summarised form below and support the reasons for refusals set out in the decision notice of 19 March to Application 18/P/5118/OUT. (See Appendix B). The relevant policies that relate to our objections to airport expansion are:
  - 1.1.1. National Planning Policy framework
  - 1.1.2. Policies CS23 and DM50, which are specific to Bristol Airport
  - 1.1.3. Policy CS1 on addressing climate change
  - 1.1.4. Policy CS3, CS23 and CS26 which concern the impact of increased atm's on communities
  - 1.1.5. Policies CS4 and DM8 and DM9 relating to nature conservation
  - 1.1.6. Policies CS6 and DM12 on the Green Belt
  - 1.1.7. Policies CS1 and CS10 relating to unsustainable public transport provision
  - 1.1.8. Policy CS23 which requires that proposals for the development of Bristol Airport "demonstrate satisfactory resolution of environmental issues". Policy DM50 also emphasises this. One of the main environmental issues concerns the climate change impact, which impacts on both people and the planet. This is also the focus of Policy CS1 which prioritises reducing carbon emissions and tackling climate change, committing the Council to action in this regard. Another main environmental impact is on biodiversity, which Policy CS4 requires to be maintained and enhanced. Green Belt impact is also an important environmental impact.
- 1.2. It is notable that these policies – in particular the airport-specific policies CS23 and DM50 – do not prioritise the growth of the airport at all costs – in fact the opposite. Vision 1 of the Core Strategy specifically states that, when considering the future planning of the airport, there needs to be a **balance between any advantages of economic growth and the impacts on the region, on the health and amenity of individuals and on the natural environment**. This is reflected in the Refusal Reasons 2, 3 and 4. (See Appendix B).
- 1.3. One of the main arguments made by BAL and others in favour of the Proposal is the level of economic benefit that they are claiming. The PCAA believe that BAL has overstated the projected economic benefits and the economic argument in order to support their desire for airport expansion. The New Economic Foundation report commissioned by the PCAA refutes the arguments given by BAL.

1.4. The PCAA understand that our submission is passed to the Inspectorate and forms part of the Appeal.

**1.5. Reasons why the PCAA continues to support refusal**

1.5.1. BAL suggests that growth to 12mppa will be achieved by 2030 under the scenario they have adopted for this application. The PCAA consider this to be unrealistic and that much slower growth, if any, is more realistic in a post-Covid world influenced strongly by new policies shaped by the UK's 'Net Zero' commitment. The PCAA challenge the application to expand to 12mppa because the need for this expansion has not been adequately proven.

1.5.2. If, however, the Inspectorate accepts that there is a proven level of demand for expansion to 12mppa, the PCAA strongly challenges a number of fundamental assumptions that influence the scale and cumulative impact that will be suffered by local communities and the environment. These include:

1.5.2.1. The nature and timing of the movement to a new, more efficient fleet mix for the airlines operating out of the airport. BAL's assumptions are over-optimistic and BAL has almost no power in shaping the airlines' investment decisions. The fleet mix has a bearing on carbon emissions, the number and frequency of air movements, noise levels, air quality and human health.

1.5.2.2. Assumptions on traffic flows. BAL assumes that Covid will lead to less traffic on the road which the PCAA challenges. BAL's figures also include serious discrepancies which makes one doubt their accuracy. Assumptions on traffic are fundamental to the analysis of congestion, air quality, carbon emissions, traffic noise and road safety particularly for cyclists.

1.5.2.3. Assumptions that replacement habitat following the loss of open, green belt land will produce a net gain in biodiversity and sufficiently quickly. There is no evidence to support BAL's case

1.5.2.4. Assumptions surrounding BAL's economic analysis. The New Economic Foundation (see their report, submitted separately on behalf of the PCAA) challenge a number of critical assumptions and show that the development cannot be justified without a full DfT webtag appraisal.

1.5.3. The additional information provided by BAL is insufficient to over-turn the clear logic within the refusal of the planning application by NSC.

1.5.4. On this basis the PCAA believe that a regulation 25 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (**the Regulations**) request should be made for further environmental information for the following issues:

1.5.4.1. all information listed at paragraph 3.6 of this document;

1.5.4.2. issues identified in 4.5.2;

- 1.5.4.3. the cumulative impact issue identified at 10.9.1;
- 1.5.4.4. the baseline information identified at 10.10.5;

#### **1.6. Conditions, in the event that the application is granted**

- 1.6.1. Comments on Conditions are shown under each section and are in our original submission

#### **1.7. The high priority concerns on the part of local communities**

- 1.7.1. The Addendum to the Environmental Statement gives no assurance to the local communities that the impacts of the growth to 12 mppa will not affect health and well-being and that the local environment will not deteriorate further. The high number of objections, over 8,000, and the petitions opposing the planning application recognise the urgent need to reduce emissions now to stabilise the planet for future generations. Parishes' concerns remain as before that, owing to an increased number of movements, there will be: an increase in ground and air noise, day and night; more traffic on the roads leading to poorer air quality and car parking on green belt land (where protected species forage); additional impacts from airport operations including an increase in greenhouse gas emissions.
- 1.7.2. Please note that the current consultation has led to a large degree of confusion in the public domain as to why they have to respond, again, to further information from BAL when they have already objected. Some members of the public who objected previously have not received emails on this new consultation from North Somerset Council.

## **2.Context**

- 2.1. Bristol Airport Limited is majority owned by Ontario Teachers' Pension Plan, Canada. It is operated by Bristol Airport Limited (BAL). BAL was granted outline planning permission by North Somerset Council on 16th February 2011 for the expansion of Bristol Airport to handle 10 mppa. Bristol Airport and passenger numbers have grown by over 40%, from 5.8 mppa in 2011 to 8.2 mppa in 2017. Bristol Airport is now proposing a further 50% growth to 12 mppa, which is phase 1 of growth to 20 mppa.
- 2.2. In 2019 the airport reached approximately 9 mppa. The application was refused on 19 March 2020 and BAL appealed this ruling. Owing to the pandemic it was not until 30 November 2020 (nearly nine months later) that Bristol Airport submitted updated passenger demand forecasts which previously were predicted to reach 10 mppa by 2021 and 12 mppa by 2026.

The Airport has also updated their Environmental Statements and other documents and has suggested the following scenarios for growth to 12 mppa:

- 2.2.1. the Faster Growth Case sees Bristol Airport reach 10 mppa in 2022 and 12 mppa in 2027
- 2.2.2. the Core Case, sees Bristol Airport reach 10 mppa in 2024, increasing to 12 mppa in 2030.
- 2.2.3. the Slower Growth Case sees Bristol Airport reach 10 mppa in 2027 and 12 mppa in 2034

2.3. The Core Case is the favoured growth rate for these new documents. The new documents, no matter the growth strategy, pursue an approach of 'business as usual'. There has been no reflection within the documents on how the pandemic could accelerate environmental changes which are urgently needed to respond to the climate and ecological emergencies.

2.4. In terms of air transport movements (atm), the updated forecasts show that there will be growth from 61,382 in 2019 to around 75,500 annual commercial atm at 12 mppa in 2030. It should be noted that this new forecast at 2030 represents a decrease of around 8,300 atm compared to the original forecast, owing to the use of larger aircraft and higher load factors. But if we include 'positioning' and 'other' movements the figure raises to 86,500 atm each year by 2030 which is a significant increase of 40% above the level in 2019.

## **2.5. Update on Declarations and Policies**

2.5.1. Local Authority Declarations of the Climate Emergency - All Local Authorities surrounding the Airport, City Councils and the West of England Combined Authorities formally recognise the Climate Emergency.

2.5.2. North Somerset Climate Emergency - NSC Declaration of a climate emergency has led the Council to have a Cabinet member to be responsible for the Climate Emergency and Environment. This ensures that work on Climate Change is carried out collaboratively across the Council to ensure that a bold Climate Plan is produced and that progress is made on it. The emerging Local Plan 2038 main vision is one of a sustainable future for the next generation and to move towards a low carbon economy.

2.5.3. North Somerset Council - Motion on the Nature Emergency - A motion on the Nature Emergency is being put forward to the next full meeting of Council on 12 January 2021.

2.5.4. Bristol City Council - On 8 December 2020, Bristol City Council passed the following motion:

*'Acknowledges that airport expansion is incompatible with Bristol, the West of England and the region's carbon reduction targets and therefore*

*must not go ahead.*

- Acknowledges that aviation is responsible for 3% of all carbon emissions worldwide, and that, critically, it is the only area where emissions are projected to increase.*
- Understands that, in order to reduce the air miles travelled, which is essential, imposing a tax on aviation fuel and using other mechanisms to foster responsible air travel is essential, but also recognises that these powers are not within our remit.*
- Recognises the negative environmental consequences of the expansion of Bristol Airport, and supports the North Somerset Planning Committee's decision to reject the expansion plans, as there are other elements such as noise nuisance and loss of green belt land which are also unacceptable.*
- Recognises Bristol Airport's role as an employer in the region and recognises the need for a just transition to a greener economy - that does not leave workers worse-off - moving the economy away from polluting high carbon activities like flying to more sustainable forms of travel.*
- Notes that promising developments have been made towards moving the aviation sector towards green technology, such as electric and hydrogen-powered planes, which would provide green jobs in Bristol and the surrounding area. However, Council also notes that these technologies are many years away from implementation and that they need the accelerant of knowing that unabated expansion will not be allowed.*
- Calls on the Mayor to lend his support to any Bristol City councillor that would like to write, individually or collectively, to the Planning Inspector hearing the appeal, asking them not to overturn the decision of North Somerset Council to reject airport expansion.'*

2.5.5 North Somerset Council is obviously the lead Council on the Airport application but Bristol City Council is also a major stake holder as is Bath and North East Somerset Council. A large percentage of passengers fly from these extended urban areas.

## **2.6 Absence of Master Plan**

- 2.6.1 A Master Plan was expected from Bristol Airport sometime in 2019. This has yet to materialise. The delegated report in June 2018 by North Somerset Council to the Scoping Opinion of the Environmental Impact Assessment remains the only document within the application which shows BALs intention to grow to 20 mppa predicted by the mid- 2040s.
- 2.6.2 The BA Master Plan 2006 - 2030 only carries a preliminary assessment of the solutions to growth to 12 mppa and expressly states '*detailed proposals for long term development between 2016 and 2030 will be brought forward as part of the Master Plan review process*'.

2.7 **Green Book Review 2020.** The 2020 review states that:



- 2.7.1 *'Given the UK's recent legal requirement to achieve net zero carbon emissions by 2050 and the 25 Year Environment Plan (2018), the review has also revisited the guidance included in the 2018 Green Book on appraising environmental impacts, and*
- 2.7.2 *Carbon emissions should be assessed using the approach set out in BEIS Carbon Values. These values are calculated as the cost of removing an additional tonne of emissions from the atmosphere calibrated to a path of emissions consistent with meeting the UK's legal targets.* [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/937700/Green\\_Book\\_Review\\_final\\_report\\_241120v2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/937700/Green_Book_Review_final_report_241120v2.pdf)
- 2.7.3 Bristol Airport has used the HM Treasury (2018) Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal for carbon pricing in the document titled 'Passenger Transport Forecasts'. But, this guidance was updated in March 2019. The Treasury has again, in 2020, revised the Green Book. <https://www.gov.uk/government/publications/valuation-of-energy-use-and-greenhouse-gas-emissions-for-appraisal>

## **2.8 Aviation Strategy White Paper**

- 2.8.1 Several references are made to the Aviation Strategy White Paper based on the 2018 Green Paper titled 'Aviation 2050'. We understand that this will be replaced with a new Aviation Recovery Plan early 2021. The Plan will update the 2018 Green Paper: 'Aviation 2050, the future of UK aviation' and the noise and climate change chapters will be updated.

## **2.9 North Somerset Local Plan 2023 – 2038**

- 2.9.1 The North Somerset Local Plan 2038 is emerging policy. One of the main visions is that the Local Plan provides a sustainable environment for future generations as well as the present.

## **2.10 Joint Transport Local Plan 4**

- 2.10.1 At the West of England Combined Authorities meeting held 20 March 2020 additional points were added to the Plan. These were
- 2.10.2 *'Amendment 1 therefore added an additional paragraph at page 6 to reflect that there was full commitment within JLTP4 to reducing carbon and that JLTP4 was fully in line with and took account of the Paris Agreement.*
- 2.10.3 *Amendment 2 added an additional paragraph at page 147, to reflect that the JLTP's Strategic Environmental Assessment also took into account the Paris Agreement.'* <https://westofengland-ca.moderngov.co.uk/documents/q443/Printed%20minutes%2020th-Mar-2020%2010.30%20Joint%20meeting%20-%20West%20of%20England%20Combined%20Authority%20Committee%20a.pdf?T=1>

## **2.11 Climate Change Act 2008**

- 2.11.1 The Climate change Act 2008 was amended 19 June 2019 to incorporate the Net Zero Emissions.

## **2.12 The Ten Point Plan for a Green Revolution point 6 is titled ‘ Jet Zero and Green Ships’**

2.12.1 The Government announced the ten point plan on 18 November 2020 with funding being increased to encourage the uptake in sustainable aviation fuel and more funding for research and development of zero emission aircraft.

## **2.13 Nationally Determined Contributions under the Paris Agreement**

2.13.1 The UK Government announced on 3 December 2020 its own NDC target to reduce emissions by 68% by 2030 compared to 1990 levels. This target does not yet include aviation and shipping emissions.

## **2.14 Sixth Carbon Budget December 2020.**

2.14.1 The Sixth Carbon Budget titled the ‘The UK’s path to Net Zero’ was published on 9 December 2020 by the Committee on Climate Change. The report recommends that the Government reduce demand from carbon-intensive activities such as flying and recommends that aviation and shipping emissions should be included in the sixth budget.

## **2.15 Heathrow ruling**

2.15.1 On 16 December 2020, the Supreme Court ruled in favour of Heathrow Airport. The Court case was on the lawfulness of the Airports National Policy Statement (the “ANPS”) and its accompanying environmental report. The ANPS is the national policy framework which governs the construction of a third runway at Heathrow Airport. The Court decided that the only relevant Climate Change legislation was the 2008 Act, thus, the third runway could go ahead. But Heathrow will have to show within the Development Consent Order that it would be compatible with the up-to-date requirements under the Paris Agreement and the Climate Change Act 2008 as amended to take into account of the Net Zero emissions target.

# **3.Economic Assessment**

## **3.1. Summary:** Our concerns with BAL’s Economic Assessment include:

- 3.1.1. Absence of an assessment in line with the DfT’s policy TAG A5.2
- 3.1.2. Inappropriate projections that do not reflect the impacts of Brexit and fail to recognise latest thinking on the impact of Covid
- 3.1.3. Over-statement of the beneficial impacts on employment
- 3.1.4. An inappropriate argument in respect of the impact on air fares if expansion is not permitted
- 3.1.5. Failure to recognise the impact of the latest Heathrow ruling
- 3.1.6. Failure to recognise the impacts on the UK Trade Balance

## **3.2. New Economic Foundation Report**

- 3.2.1. The PCAA has commissioned a report from the New Economic Foundation to interrogate and challenge the assessments made by York

Aviation on behalf of BAL. The NEF Report is being submitted as a separate document. The submission covers:

- 3.2.1.1. broad principles of good economic appraisal, adherence to TAG and Green Book
  - 3.2.1.1.1. Appropriate assessment boundaries
  - 3.2.1.1.2. Appropriate approaches to displacement
  - 3.2.1.1.3. Implications of recent developments in climate legislation, CCC etc.
- 3.2.1.2. Job creation potential/claims
- 3.2.1.3. Social cost benefit analysis bringing together all monetised impacts
- 3.2.1.4. Conclusions: Net present value and 'value for money' of the scheme

### **3.3. PCAA Response to BAL's economic impact assessment**

- 3.3.1. In November 2020, Bristol Airport Limited ("BAL") submitted to the Planning Inspectorate an economic impact assessment addendum to planning appeal 20/P/2896/APPCON prepared by York Aviation ("the EIA addendum"). The document is fundamentally flawed for the procedural reasons set out in section 3.4 below and the substantive reasons set out in paragraphs in the remainder of the document.

### **3.4. Procedural defects**

- 3.4.1. The Department for Transport has issued a detailed policy for the appraisal of government interventions in the aviation industry. It is set out in TAG Unit A5.2 Aviation Appraisal of May 2018 ("TAG A5.2"). TAG A5.2 is aviation specific. Paragraph 1.1.3 states clearly that the policy is expected to apply to most government interventions in the aviation sector including planning applications for individual schemes. Paragraph 3.1.1 acknowledges that TAG A5.2 is designed to quantify and monetise the welfare impacts of government policies such as the support for the expansion of an existing airport. Sections 3.2, 3.3 and 3.4 contain detailed guidance including mathematical formulae on the measurement and monetisation of the economic, environmental and social and distributional aspects of aviation interventions.
- 3.4.2. TAG A5.2 adopts further detailed assessment criteria by cross reference to the Transport Appraisal Process (in paragraph 2.1.1) and other TAG units including TAG A1.1 - Cost Benefit Analysis and TAG A1.3 - User and Provider Impacts (both in paragraph 3.2.4), TAG A1.2 - Scheme Costs (in paragraph 3.2.10), TAG A2.2 - Appraisal of Induced Investment Impacts (in paragraph 3.2.11), TAG A3 Environmental Impacts (in section 3.3) and TAG A4 - Social and Distributional Impacts (in section 3.4).
- 3.4.3. TAG A5.2 and the supporting policies provide a comprehensive framework for the impact appraisal of airport planning applications. The

use of TAG A5.2 is not limited to aviation appraisals carried out by the Department for Transport itself. The scope, detail and precision of TAG A5.2 and the supporting policies leave no doubt that they are intended for the appraisal of major airport planning applications. Any argument to the contrary would deprive TAG A5.2 of its efficacy in a crucial aspect of aviation appraisal. Why should there be a detailed policy framework for aviation appraisal if airport operators can ignore it at their convenience?

- 3.4.4. It follows that TAG A5.2 and the supporting policies constitute a material consideration in BAL's planning appeal. Without this detailed review the assessment is very much substandard and is lacking a key assessment in line with best practice. Without the detail on the issues set out in this paragraph above the decision maker is going to miss fundamental detail which will enable them to make a reasoned and measured decision. For this reason further environmental information should be required of the BA to supply a web TAG analysis under the Regulations.
- 3.4.5. Section 4 of the EIA Addendum contains an updated socio-economic cost benefit analysis. Paragraph 4.3 acknowledges expressly that the approach to that analysis is the same in concept as the economic elements of the TAG A5.2 approach. However, it then emphasises that the analysis "is not a WebTAG appraisal and is not intended to be one". York Aviation also take the view, in an express reference to paragraph 1.1.1 of TAG5.2, that "WebTAG itself acknowledges that its applicability to aviation projects is limited given its origins in the appraisal of surface modes."
- 3.4.6. For the reasons set out in paragraphs 3.4.2 - 3.5 above, that view is untenable. BAL should have prepared the original economic impact assessment in compliance with TAG A5.2, but failed to do so. North Somerset Council should have evaluated the original economic impact assessment on the basis of TAG A5.2, but failed to do so. In the EIA Addendum, York Aviation apply the TAG A5.2 criteria to some areas such as jobs and productivity, but not to others such as noise and carbon emissions. That approach distorts the analysis. TAG A5.2 and the supporting policies provide a coherent and comprehensive template for aviation appraisal, not a policy menu for selective adoption at the appellant's convenience.
- 3.4.7. York Aviation also rely heavily on statistical material that is not independently verified or audited, for example in Tables 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8 and 3.13 and in Tables 4.1 and 4.2.

### **3.5. Substantive defects**

- 3.5.1. BAL have failed to use the disaggregated displacement that they have calculated in their GVA / GDP estimates. Applying these with known factors for the airports from which traffic could be displaced results in

reductions in estimated employment benefits at the South West & South Wales level of about 25%, or 3,056 additional jobs rather than 4,000. At the UK level, using this information results in an additional GVA estimate of just £100 million, and just 162 additional jobs.

- 3.5.2. Brexit will have a long-term impact on civil aviation between the UK and member states of the European Union. In his testimony to the Treasury Committee of the House of Commons on 23 November 2020, Andrew Bailey, the Governor of the Bank of England, said that he was more optimistic about the long-term effects of Covid 19 than the long-term effects of Brexit on the UK economy. He also said that there was no such thing as a friction-less deal between the UK and the European Union.
- 3.5.3. The UK economy will be exposed to the sequential and cumulative effects of Covid 19 and Brexit. The Office for Budget Responsibility has predicted that there will be 800,000 fewer jobs in the UK economy this year than in 2020. It also expects unemployment to remain above its February 2020 level until at least 2024. People who lose their jobs, or fear that they might lose their jobs, will spend substantially less. There is also a real risk that Covid 19 induced levels of corporate debt suppress subsequent economic growth. A full recovery from the 2020 recession, at 11% of GDP the worst since 1709, will take many years.
- 3.5.4. York Aviation acknowledges, in paragraph 2.1 of the EIA Addendum, that the Covid-19 pandemic is “the primary driver behind the requirement to update the original economic impact assessment”. However, the Governor’s comments leave no doubt that the long-term effects of Brexit are the stronger driver. If the lesser effects of Covid 19 require an update to the economic impact assessment, it follows with even greater force that a more extensive update, based on a range of aviation scenarios, is required in response to Brexit.
- 3.5.5. While there is a passing reference to Brexit in paragraph 3.3 of the EIA Addendum, it makes no attempt to assess the effects of Brexit on BAL’s expansion plans. BAL depends to a large extent on low-cost flights to and from member states of the European Union. They are BAL’s core business. They will be exposed to the sequential and cumulative effects of Covid 19 and Brexit. These effects are likely to cause a permanent decline in the spending power of low-cost passengers. Their impact on BAL’s airline customer base has not been taken into account. The customer base for these flights will be disproportionately affected by the economic downturn. There will be a permanent decline both in the ability and the willingness of those customers to incur discretionary expenditure on overseas holidays. These factors have not been taken into account in the EIA Addendum.

### **3.6. Application to the Planning Inspectorate**

- 3.6.1. Based on the analysis in this objection, the Planning Inspectorate needs to make a request for further environmental information from BA under regulation 25 of the Regulations to require BAL to provide:
- 3.6.1.1. All information not included in the EIA Addendum which would have to be provided in support of a full aviation appraisal under TAG A5.2 and supporting policies in relation to BAL's planning appeal and, in particular:
- 3.6.1.1.1. Revised demand modelling that treats carbon pricing in line with current guidance and legislation.
  - 3.6.1.1.2. Use of disaggregated displacement in GVA / Employment calculations
  - 3.6.1.1.3. Appropriately including the reciprocal effects of air fare and tax changes, at a conservative 1:1 unless BAL can demonstrate otherwise.
  - 3.6.1.1.4. Presentation of non-CO2 effects, in line with guidance. A high carbon cost scenario that is fully specified, in line with guidance.
  - 3.6.1.1.5. Fully monetised Air Quality and Noise impacts
  - 3.6.1.1.6. Other corrections identified in the NEF report
- 3.6.2. A full appraisal of the effects of Brexit on BAL's business.

### **3.7. Socio-Economic Impact**

- 3.7.1. The Officers Report to the Planning and Regulatory Committee stated that *"BAL's economic impact assessment does not contain detailed work to ascertain whether the requisite skill sets in some parts of Weston-super-Mare and South Bristol (areas of relative deprivation) will be sufficient to fill the newly created roles associated with the airport expansion in both the operational and construction phases on the project. As such there is some uncertainty around whether the skills of the available workforce in these areas will match the requirements of the new jobs"*.<sup>1</sup>
- 3.7.2. The PCAA recognise that there is relative deprivation in parts of South Bristol and Weston Super Mare and increased levels of unemployment caused by the pandemic but stress that the expansion plans yield only small increases in employment (see below for details), far too few to be one of the key factors to allow BAL to expand. It is worth noting that refusal of permission to expand is not a threat to current employees who would remain in employment.
- 3.7.3. The PCAA fully commend the 106 Agreement put forward, such as an education programme and employment support fund etc. but view these points in the Agreement as conventional good practice for any major employer and recognise that some initiatives, such as the education programme, are already in situ and represent nothing new. To illustrate

this, Weston College already has a good relationship with the Airport and is helping to develop the skills required.

3.7.4. Section 5.3.5, bullet point 4: The airport's latest models show a drop of around 7% in forecast employees in the 10mppa forecast and 5% in the 12mppa forecast. This is a substantial drop in employee numbers. *'The 2018 base remains unchanged from the original ES. The 10 mppa forecast has reduced from 3,875 to 3,625 employees, and the 12 mppa forecast has reduced from 4,575 to 4,350 employees.'* This shows that the Airport is not a great generator of jobs and that these jobs may be reduced further with technological efficiencies whilst being the major polluter in the region.

3.7.5. The PCAA accept the view of more expert observers who anticipate that there will be fewer jobs at airports in the future, driven by technological efficiencies. The Asian airports are currently using robots. For example, Narita International Airport near Tokyo has over 10 cleaning robots taking the jobs of cleaners. Airport expansion is not a pathway to job creation on any meaningful scale.

<https://www.japantimes.co.jp/news/2019/12/27/business/unmanned-cleaning-robots-japan/>

3.7.6. The Officers Report shows that BAL's expansion plans may exacerbate existing skill shortages and create additional pressures on the local labour market. The West of England is not dependent on one business sector but has a healthy mix of sectors. Thus, unlike Crawley near Gatwick Airport, the West of England is not dominated by any one sector and employment growth is certainly not determined by Bristol Airport.

The West of England has a diverse mix of sectors that mirrors the wider UK.

[https://planning.n-somerset.gov.uk/online-applications/files/1F89148CE625FFE1EDFBEB9738FAF217/pdf/18\\_P\\_5\\_118\\_OUT-](https://planning.n-somerset.gov.uk/online-applications/files/1F89148CE625FFE1EDFBEB9738FAF217/pdf/18_P_5_118_OUT-)

[PLANNING AND REGULATORY COMMITTEE 10 FEBRUARY 2020 COMMITTEE REPORT-2891216.pdf](https://planning.n-somerset.gov.uk/online-applications/files/1F89148CE625FFE1EDFBEB9738FAF217/pdf/18_P_5_118_OUT-PLANNING AND REGULATORY COMMITTEE 10 FEBRUARY 2020 COMMITTEE REPORT-2891216.pdf)

### **3.8. Other Comments on the Economic Impact Assessment Addendum**

3.8.1. Point 2.13 of BAL's document shows three organisations which suggest recovery time scales from the pandemic. These are ACI Europe, IATA and Euro Control. These organisations forecast a return to normal, pre-pandemic levels at around 2024. York Aviation has failed to mention ACOG (Airspace Change Organising Group). ACOG shows three scenarios for recovery, a V shape (considered to be very unlikely), a U shape and an L shape recovery. The U shape recovery scenario supports the findings of IACI Europe, IATA and Euro Control for recovery to pre-pandemic levels at around 2024/25. The L shape recovery scenario is less optimistic but is entirely possible, where the demand for aviation returns more slowly and remains below pre-crisis levels for a prolonged period, driven by a fundamental shift in attitudes towards aviation. The L shape recovery is where the global, public health

response fails to control the spread of the virus for an extended period and measures taken are unable to prevent deep recession, many bankruptcies and a banking crisis. The PCAA would add that a change of attitudes to aviation will also be driven by climate change and the ecological emergency. The Slow growth case put forward fails to address these issues. <https://www.ourfutureskies.uk/media/2slf3twa/acog-remobilising-airspace-change-report-july-2020.pdf>

3.8.2. Point 2.17 states '*while business travel will probably take longer to recover, we expect it to recover substantially before the time period for this assessment.*' This statement has been added without evidence. A new study by IdeaWorks and reported by the Wall Street Journal is the first detailed look at the long-term impacts Covid-19 could have on business travel. It estimated that between 19% and 36% of airlines' business traffic base will not return to the skies.

<https://www.forbes.com/sites/benbaldanza/2020/12/01/new-study-estimates-up-to-36-of-airline-business-travel-wont-return/?sh=7f5696234cf1>

3.8.3. Point 3.7 states that '*employment and GVA are supported by the role that the airport plays in enabling business travel and the movement of air freight*'. Currently the airport has no air freight movements that are shown or referred to in the Operations Monitoring Report produced annually by the Airport. The paragraph in which the above sentence is presented has been copied and pasted from the original York Aviation Report dated November 2018. Point 4.22 of the original EIA shows an econometric relationship whereby a 10% increase in combined business air travel and air freight would result in a 0.5% increase in productivity in the economy. York Aviation analysis was based on the 'Impacts on the UK Economy through the Provision of International Connectivity – Oxford Economics for Transport for London (2013).' This analysis is not relevant to the expansion plans for Bristol Airport because, firstly, there is currently no air freight and, secondly, the airport does not have suitable road access for handling freight relying only on the A38, A370 and rural lanes.

3.8.4. Business travel is going to take a long time to recover and may not recover to levels pre-pandemic owing to the increased use of video conferencing. Note that in 2013, video conferencing for businesses was in its infancy, today it is an easy, efficient technology replacing many face-to-face meetings, bringing time and cost savings to businesses. Only 15% of passengers from Bristol Airport were from the business sector in 2015. The accuracy of the tables showing GVA and employment growth is therefore highly questionable as they include 0.5% increase in productivity from increased business travel and air freight – both of which are clearly unlikely.



- 3.8.5. Point 3.29 critiques other assessments of BAL's economic analysis but accepts nothing despite their modelling being based on assumptions not evidenced-based data.
- 3.8.6. Point 5.2 *'the GVA and employment assessment in Section 2 assumes that if the airport is constrained then normal productivity growth will continue to occur at the site once the 10 mppa threshold is reached and that this will slowly erode employment at the airport over time, as fewer people are required to deliver the passenger throughput.'* We agree with this statement but the fact that technological improvements reduce levels of employment is nothing new and is certainly not a reason to justify the desire to expand the airport. The Airport states that: *'The 2018 base remains unchanged from the original ES. The 10 mppa forecast has reduced from 3,875 to 3,625 employees, and the 12 mppa forecast has reduced from 4,575 to 4,350 employees.'*
- 3.8.7. Jobs losses will occur at any airport owing to technological efficiencies. Under the current cap, levels of employment have reduced for example through losses at check-in desks as a result of automation. Under the 10 mppa planning consent there was expected to be an increase in the number of check-in desks to 67 from an original 50. Following recent works on Hold Baggage Screening (HBS) in 2017/18, the number of check-in desks has now reduced to 49. These 49 desks are currently deemed sufficient for growth to 12 mppa. As an example from elsewhere, in October 2017, Singapore's Changi airport opened a new Terminal 4. It has a fully automated check in system which allows passengers to check in and board without having to engage with counter staff. This technology will inevitably mean fewer airport jobs if Bristol Airport follows suit. The Asian airports are now using robots instead of people to clean the terminals. A letter to the Treasury department on 31 July 2020 highlighted that the *'the UK aviation industry is small and employment in the sector has been in decline for many years. ONS data shows that air transport, and services incidental to it, account for less than 0.7% of GDP and only 0.4% of jobs'*. (from Aviation Communities Forum and other NGOs)
- 3.8.8. Point 5.3 states *'Recent research by SEO34 on air fare levels at constrained airports found that a 10% constraint results in a 1.4% increase in average air fares in liberalised markets. Restriction of Bristol Airport to 10 mppa would represent a significant and growing constraint on the airport that would impact on fare levels. Crudely speaking, in 2030 in the Core Case Bristol Airport's passenger throughput would be constrained by around 17% if it were unable to grow above 10 mppa, suggesting an increase in fares at the airport of around 2.4%.'* An increase of this level is barely significant; the average fare in 2019 is approximately £70 (CAA statistics) and a 2.4% increase is just £1.68. This point is anyway at odds with those in the updated car parking

strategy Figure 9 – ‘Forecast impact of geographic and demographic changes on likelihood to park’. It states’ *the increasing levels of wealth leads to increasing propensity for passengers to arrive by car; average wealth in the region is forecast to increase*’ in which case the passengers can easily afford the 2.4% increase in air fare. Note that it is estimated that 70% of the total number of flights are taken by only 15% of the population, while 57% of the population took no flights abroad whatsoever in 2013. Those who do fly are significantly wealthier.

<https://neweconomics.org/2015/06/a-fairer-way-to-fly>

- 3.8.9. Point 5.4 and 5.5 again refer to business passengers and compares Bristol Airport with Heathrow. The two are very different. Heathrow has two runways which are both longer than at Bristol. Bristol has one of the shortest airport runways in the country with runway 27 having an available landing distance of only 2,060 m (6,760 ft). The length of the runway acts as a constraint on long-haul destinations, thus, short-haul destinations will remain dominant under the growth scenarios proposed under 12 mppa. Heathrow is highly accessible from Bristol, Bath, Swindon and Weston and other areas in the South West by rail and coach. Many people use public transport rather than access Heathrow by car. The frequencies of flights to business destinations long and short haul make it highly desirable for the business sector. The PCAA question the need for expansion at Bristol in light of the Government support to the third runway. The Heathrow ruling December 2020, clarifies that Heathrow can apply for Development Consent Order for the third runway.

### **3.9. UK Trade Balance**

- 3.9.1. In 2020 the pandemic and the grounding of most air travel resulted in good news for the UK balance of payments. In 2019, UK residents made 93.1m visits overseas compared to 40.9m visits to the UK by overseas residents. This resulted in a record £33.9bn current account trade deficit on international travel and tourism 'Travel Trends, 2019', ONS (CD23.42)
- 3.9.2. It is estimated that the Spanish tourism industry has lost £20 billion this year from tourists. There have also been losses in the tourist industries of France, Greece and Portugal. Whilst the UK also has lost income from foreign tourists, it is benefitting in net terms to the tune of about £3 billion every month <https://stopstanstedexpansion.com/press-releases/goodbye-2020-an-extraordinary-year/>

## **4. Traffic and Transport Assessment**

### **4.1. Summary**

4.1.1. Refusal Reasons 1 and 5 relate to the transport assessment (Appendix B). The PCAA continue to support these two reasons for refusal. Our concerns with BAL's assessment of traffic and transport include:

- 4.1.1.1. A failure to recognise the inescapable fact that the location of Bristol airport is not suitable for growth beyond 10mppa because of the lack of infrastructure which leads to high volumes of vehicle movements on small roads.
- 4.1.1.2. The increase in vehicle usage is contrary to local and national policies to reduce car travel
- 4.1.1.3. The targets for use of public transport are not ambitious in comparison with other airports (just 17.5%) but will nevertheless be highly challenging because of the lack of infrastructure serving Bristol Airport
- 4.1.1.4. Projections for future traffic volumes fail to take proper account of the impact of Covid and have inconsistencies
- 4.1.1.5. The specific and adverse impact on cyclists, not least because Brockley Combe is a well-established Sustrans route

#### **4.2. Lack of Infrastructure**

- 4.2.1. The Officers Report to the Planning and Regulatory Committee identified rail access to other airports in the UK. Bristol Airport and Cardiff Airport remain the only two airports without rail or metro links. Luton Airport is opening in 2021 'the Dart', a connecting rail service from the main Luton Railway Station. Bristol Airport is approximately 12 miles from both Bristol Temple Meads station and Worle station. The closest railway station is Nailsea/Backwell approximately three miles away. Due to the topography, the construction of a rail link is not expected in the foreseeable future, would be very expensive and bring considerable environmental damage.
- 4.2.2. The nearest motorway junctions are junctions 22, 21, 20 and 19. These are distant from the Airport which require car movements to and from the airport on small 'B' roads/rural lanes.
- 4.2.3. One of the main reasons for the Airport to be capped at 10 mppa was the unsuitable location of Bristol Airport and the impact of vehicle movements beyond growth of 10 mppa.

#### **4.3. Public Transport Modal Split**

- 4.3.1. To overcome the problem of congestion on roads to the airport, the public transport mode share target has increased from a target of 15% at 10 mppa to 17.5% at 12 mppa, whilst the staff travel target has increased from 25% to 30% by sustainable modes. This compares with only 7% of airport-based staff actually travelling to/from the airport by

public transport in 2019. Both these targets are very challenging owing to the lack of infrastructure identified above. The consequences for local communities are extremely high if the targets are not met resulting in even more congestion on the road network.

- 4.3.2. Table 8.22 of the original transport assessment shows that in the peak month of August there is predicted to be a total 5575 daily vehicle movements from airport traffic and Table 3.20 from the updated technical addendum shows total daily vehicle increase from an additional 2 mppa in peak month of August as 5,924 daily vehicle movements. This is a substantial daily increase at peak times of 6.3%. At the same time the addendum states in Table 5.3 there is a rise of between 4 -5% in traffic compared to the original ES due to additional growth in background traffic. The combined impact is more than local roads can handle safely and without undue congestion.
- 4.3.3. The key point is that modest improvements in the use of public transport do not get close to enabling the roads to accommodate large increases in car traffic owing to airport expansion.
- 4.3.4. In addition, there is an inconsistency in the figures if one compares the data relating to traffic on specific roads with the generalised data on how passengers will travel to and from the airport.
- 4.3.4.1. BAL data for the only four access roads to the airport (A38 N; A38 S; West Lane and Downside Road) when extrapolated for a whole year indicate an annual increase in traffic of 281,528 compared with a 'no development' scenario. This overstates the figures because the data is understood to relate to the peak month of August and other months will be lower, but no alternative data is provided.
- 4.3.4.2. Applying BAL's assumptions to the 2mppa extra passengers (e.g. public transport usage; drop & go; taxi usage; use of car parking) yields a very different figure for increased traffic 1,678,421. (See table below)

	<b>2030 All Traffic 18hr AAWT - without development</b>	<b>2030 All Traffic 18hr AAWT - with development</b>	<b>Increase in All Traffic 18hr AAWT</b>	<b>% Change in All Traffic 18hr AAWT</b>	
<b>West lane</b>	7475	8191	716	9.6%	Table 5.5 Environmental Statement Addendum Main Report Vol. 1 (understood to be peak month of August)
<b>Downside Road</b>	7773	8263	490	6.3%	
<b>A38 north of West Lane</b>	30949	34094	3145	10.2%	
<b>A38 south of Silver Zone</b>	21848	22911	1063	4.9%	

<b>Total increase in AAWT</b>			5,414		AAWT is Annual Average Weekly Total
<b>Total increase in a year</b>				<b>281,528 vehicles</b>	AAWT x 52 weeks (overstated as August is a peak month)

1	Passenger increase from 10-12 mppa	2,000,000	
2	Passengers using public transport	17.50%	Fig. 2.2 Addendum 5A
3	Passengers using taxis	9.90%	Fig. 2.2 Addendum 5A
4	Passengers using drop off	26.20%	Fig. 2.2 Addendum 5A
5	Passengers using parking	46.10%	Fig. 2.2 Addendum 5A
6	Public transport trips	350,000	
7	Taxi trips (assumed 1.5 journeys per passenger)	297,000	Assumes 50% of taxis are full both to and from the airport
8	Car trips for drop off (2 journeys per passenger)	1,048,000	
9	Car trips for parking (1 journey per passenger)	1,844,000	
10	Total increase in annual passenger car trips	3,189,000	Line 7+8+9
11	Average car occupancy of 1.9	1.9	See note below *
12	<b>Total increase in a year</b>	<b>1,678,421 vehicles</b>	
13	Total increase AAWT	32,277	

Taken from 2019 holiday/day trip data in gov.co.uk statistics -

<https://www.gov.uk/government/statistical-data-sets/nts09-vehicle-mileage-and-occupancy#carvan-occupancy> (no other data available in BAL documents)

#### 4.4. Impact on Cyclists

4.4.1. Section 5.1.2, bullet point 2 confirms that there is to be an increase in HGV and cars on roads of over 10% surrounding the airport. There are a high number of cyclists who cycle round the Airport using, for example, the Sustrans route on Brockley Combe. Cycling has increased substantially during 2020 and the PCAA expect the number of cyclists to grow further. Although the 106 Agreement proposes some cycling lanes close to the Airport, the PCAA do not consider the cycling lanes as sufficient to classify the risks on the roads as 'negligible' but rather 'significant'. Note that Brockley Combe is a steep and winding 'B' road and highly unsuitable as a route to access the Airport.

4.4.2. Section 5.6.4 also states that there is a change in the flow of daily vehicles including HGV greater than 10% at the A38 (North of West Lane). Given the popularity of cycling and the lack of cycle lanes on the roads around the airport, any increase in HGV movements will have a significant impact on cyclists.

4.4.3. North Somerset Council in December 2020 published an Active Travel Strategy Consultation to increase walking and cycling trips by at least 300% by 2030, to deliver safe and active travel and to reduce emissions. The proposed increase in traffic of all vehicle types along the A38, A370 and rural lanes to the Airport will undermine the goals set out within the

Active Travel Strategy. The rural lanes are heavily used by walkers, cyclists and horse riders. Parishes are requesting that these lanes are formally designated as 'quiet lanes'.

#### **4.5. Traffic Projections and Covid**

- 4.5.1. Section 5.4.14: this point recognises that the DfT has yet to take account of COVID on travel. But the Airport nevertheless makes an assumption that Covid '*is likely to result in lower traffic growth actually being realised by 2030 than the values assessed in this ESA. The flows used for future assessments are therefore likely to be an over-estimate reflecting a worst case approach.*' This assumption is unlikely to be correct - traffic levels are already back to pre COVID levels and in fact have increased further. The assumption for these assessments should have been that Covid has increased car usage with a decline in public transport usage. Note that it could take many years for the public transport to be again used at pre COVID levels.
- 4.5.2. ES Addendum Technical Appendix 5A. Section 7.1.6: An incorrect assumption has been used that reduces the TEMPro traffic model as a result of COVID. The correct assumption will increase the TEMPro traffic model in light of COVID given the increase in single occupancy car use, decrease in car sharing and public transport. . A further information request under reg 25 of the Regulations should be made so information is provided to correct this error and address the other inconsistencies identified in this section.
- 4.5.3. Section 7.1.13: The airport's expansion will cause junctions to operate at over-capacity and mean new works are required causing yet more delays to local residents.

## **5. Car Parking**

### **5.1. Summary**

- 5.1.1. Refusal Reason 4 relates to car parking (Appendix B). The PCAA continue to support this reason for refusal. Please also read the car parking section in our original submission. We have multiple concerns with BAL's assessment of car parking and they include:
- 5.1.1.1. BAL's business model relies heavily on income from car parking and to maximise margins they will prefer low-cost open land to avoid building multi-storey car parks (MSCP). They will also be motivated to increase car usage at the expense of public transport and encourage NSC to close down any competing car parking provision. Their planning submission needs to be read with these issues in mind.
- 5.1.1.2. Further use of green belt land should not be permitted and BAL should be required to accelerate provision of MSCP. This will

- protect the openness of the site and reduce the adverse impacts on loss of habitat for protected species
- 5.1.1.3. Early provision of MSCP will reduce the need to bus passengers from the south side. Given that many buses use red diesel this will help to reduce carbon emissions.
  - 5.1.1.4. It is right that BAL should be penalised if they fail to improve use of public transport and requiring them to reduce parking spaces is appropriate. This reduction, however, must take place on the open land parking so as to focus car parking increasingly on MSCPs and return the open land to habitat-friendly spaces
  - 5.1.1.5. For this reason, construction of MSCP3 should be linked to passenger numbers and not to achievement of 16% use of public transport.
  - 5.1.1.6. It needs to be stated that the Public Transport Interchange will be available for local residents to use and space is needed for these people to park cars, at a reasonable charge.
  - 5.1.1.7. BAL should not be allowed to set conditions on their financial support for infrastructure improvements, specifically, if the Heathfield or other off-site car parking projects are approved. The idea is completely wrong that NSC should arrange matters such that BAL's parking revenue is protected especially when this goes against so many of their policies on traffic, emissions etc.

## **5.2. Comments on BAL's Document**

5.2.1. Bristol Airport's business model is predicated on a highly profitable car parking strategy that seeks to offer an unconstrained number of parking spaces on open land (costing little to provide). This undermines the country's transition to a low carbon economy by encouraging people to fly and to travel to the airport by car. The PCAA know of no other business that has such a structure. Hospitals, universities, schools, railway stations and shopping centres all have parking strategies that limit space and have a structured price system to encourage the use of public transport. The airport's approach undermines the National Planning Policy Framework objectives to delivery sustainable growth. It undermines particularly the environmental objective:

5.2.1.1. *'an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'* NPPF February 2019

5.2.2. Section 15 Conserving and enhancing the natural environment, point d) states

- 5.2.2.1. *“minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”*
- 5.2.3. Section 9 on Sustainable transport point d) states
- 5.2.3.1. *“ the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains”*
- 5.2.4. The additional car parking is to be on the South side on green belt land where Greater and Lesser Horseshoe Bats forage; these are protected species. Although replacement land has been offered, the PCAA do not believe that the mitigation is sufficient and there is no evidence to indicate that this delivers a net environmental gain.
- 5.2.5. The car parking strategy is not one that supports a transition to a low carbon economy. Planning Policy does not take into consideration the cost of parking but the need for it. Thus it doesn't take into account the high or low cost of parking but whether or not there are sufficient car parking spaces. Under the planning consent of growth to 10 mppa, the multi storey car park 2 (MSCP 2) should be delivered by the time growth to 10 mppa is reached which is now predicted to be 2024.
- 5.2.6. All the MSCPs are to be situated on the North side in the period of growth to 10 and 12 mppa. To bring forward MSCP 2 would a) save green belt land and b) save emissions by reducing the need to bus passengers to the terminal. Mr Justice Hickinbottom in 2016 on BALs pricing structure stated that *‘in concluding that there were very special circumstances, the Council was entitled to take into account the different economic trends and **requirements then shown**’*. The situation is very different today with the urgent need to address the Climate and the Ecological Emergency. The reference of Justice Hickinbottom is in BALs Statement of Claim to the Inspectorate.
- 5.2.7. Figure 9 in the car parking strategy titled *“Forecast impact of geographic and demographic changes on likelihood to park”* has some additional evidence indicating that passengers are able to afford parking in MSCPs. It states firstly, that the passenger base is likely to be elderly who like to park rather than use public transport and secondly, that the region is expected to increase its wealth which increases the propensity of passengers, again, to park rather than to use public transport.

### 5.3. Automated Vehicles

- 5.3.1. The future use of automated vehicle movements to and from the airport has not been considered within the car parking strategy. If for instance this increased substantially the need for car parking would decrease.

### 5.4. MSCP 2



5.4.1. The lack of delivery of MSCP 2 has resulted in an increase in emissions as staff and passengers now have to be bussed from the South side of the Airport to the terminal.

**Table 1:** Usage of red diesel at Bristol Airport: source BA Operation Monitoring Reports

Year	Red Diesel Gas Oil CO <sub>2</sub> eq (kg)
2016	160,897
2017	206,811
2018	250,602
2019	290,242

5.4.2. As stated above, there is still no delivery date for MSCP 2 in the updated documents, only a few vague sentences stating at some point in the future it will be delivered. But the PCAA note that the following paragraph from the updated car parking document states

5.4.3. *'Point 6.3 – As MSCP2 has been consented as part of the extant 10 mppa permission, the model and phasing adopted in this assessment **assumes** that this facility will be delivered in 2024. This is consistent with the approach taken in the original Parking Demand Study (2018). However, the phasing of car parking delivery is subject to change and the draft Section 106 Agreement currently anticipates the Silver Zone Extension Phase 2 being delivered in advance of MSCP2, as reflected in the construction programme contained in the Environmental Statement Addendum. Should the phasing of car parking delivery change, this would not affect the overall parking demand requirement identified in this assessment.'*

5.4.4. Thus, there remains uncertainty of when the MSCP2 will be delivered if at all. There is no condition within the 12 mppa planning application on deliverability. Point 6.5 argues for the delivery of the Silver Zone Phase 2 to be delivered to ensure low cost parking for passengers.

5.4.5. The pandemic may well cause a decline in passengers use of public transport. This means that that there would even be more demand for MSCP in order to save the release of any further green belt land. This would certainly be applicable for the faster growth case and core growth case.

## 5.5. Silver Zone Car Park Phase 1 and Silver Zone Car Park Phase 2

5.5.1. The removal of the seasonal restriction on the existing Silver Zone Car Park Phase 1 for year round use is predicted to be open from March 2022 for immediate growth to 10 mppa.

5.5.2. An extension to the Silver Zone Car Park Phase 2 is to provide approximately 2,700 additional spaces.

**5.5.3.** Note, no date has been set for the construction of the Multi Storey Car Park 2 which was conditioned under the planning consent of 2011 to be delivered for 10 mppa. No new condition has been suggested in the current documentation of the delivery of MSCP 2.

## **5.6. MSCP 3**

**5.6.1.** Construction of MSCP3 is conditional on achieving an interim public transport mode target of 16%. In light of the pandemic and the Government warnings of using public transport, it may be some time before that target figure of 16% is achieved. Furthermore, the link with the public transport target is perverse given that BAL profits from low use of public transport. We agree with the idea of annual reviews of performance against the target of 17.5% passengers using public transport such that if improvements of 0.5% pa are missed for three consecutive years NSC may initiate a plan to reduce parking spaces. We strongly suggest that any reduction is applied to parking on open land and that MSCP3 is not linked to usage of public transport.

**5.6.2.** The PCAA suggest the MSCP 3 should be connected to passenger growth rather than the public transport mode target.

## **5.7. Public Transport Interchange (PTI)**

**5.7.1.** The PCAA welcome the construction of the PTI but the Airport is decoupling it from the MSCP 2. The PCAA expected the delivery of the PTI and MSCP 2 together as conditioned under the 10 mppa planning consent.

**5.7.2.** Since the refusal of the planning application, BAL has submitted two applications on the PTI. Application 20/P/2712/EA1 which is a request for a formal screening opinion as to whether an Environmental Impact Assessment is required for a proposed public transport interchange facility, associated internal vehicular access, relocated drop-off zone, taxi rank, new substation and new pedestrian routes and Application 20/P/2711/AIN to allow the PTI under permitted development regulations. See Appendix C for our response to these consultations.

**5.7.3.** All documents within the Addendum to the ES, the GPDO and the request for a screening opinion application fail to mention the number of short and long car parking spaces lost as a result of the change of location of the PTI and how long the temporary loss of these spaces is expected to be. The loss of car parking spaces will inevitably result in more car parking on the South side and also increased off-site car parking including on the rural lanes of parishes surrounding the Airport.

**5.7.4.** As the name implies, the Public Transport Interchange is not only for passenger use but it will also be used by members of the public wishing to access Bristol, Weston, Bath and other areas such as South Wales and Plymouth. There is very little public transport south of the Airport

and within the Chew Valley. There has been no mention of where local residents can park within the strategy. The strategy has omitted this point.

### **5.8. Heathfield Park Development**

5.8.1. The PCAA are led to believe that an application is to be validated shortly. This development is for 3,101 parking spaces. The location of the proposal is close to Junction 21 of the M5. Eco buses are expected to take passengers to Bristol Airport. This development has the potential to decrease emissions and reduce car movements on the A370, through the parishes of Congresbury and Cleeve. The development could save the land proposed on the South side known as the extension and phase 2 of the Silver Zone Area which is used by the Greater and Lesser Horseshoe Bat for foraging. Currently Bristol Airport has a near-monopoly position on car parking. The Airport's business model is predicated on a low cost car parking strategy which undermines sustainability and passenger choice. The Surface Access Strategy of Bristol Airport would not be undermined. The point the Airport is trying to state is that they could not afford to contribute to the Surface Access Strategy, if revenue from car parking was lost and low cost parking within the Silver Zone areas not developed. This position must be resisted – BAL needs to contribute to the costs of mitigating its impacts on the community and environment. If it cannot afford to do this then its scheme is unviable and should not proceed.

### **5.9. Conditions connected to car parking**

- 5.9.1. The MSCP 2 must be conditioned to be delivered immediately and before the lifting of seasonal restrictions and the release of Silver Zone Phase 2 land.
- 5.9.2. The MSCP 3 must be delivered according to growth in passenger numbers.

## **6. Green Belt**

### **6.1. Summary**

6.2. Refusal Reason 4 relates to car parking and green belt land (Appendix B). The PCAA continue to support this reason for refusal. Our concerns with BAL's assessment of the use of green belt land include:

- 6.2.1. Further use of green belt land impacts on the foraging habitats of protected species and there has been no assessment of the replacement land in order to validate the delivery of a net biodiversity gain

- 6.2.2. It is implausible that putting an extra 2700 car parking spaces on green belt land does not compromise the openness of the green belt
- 6.2.3. Green belt land should only be developed under very special circumstances and we suggest that the alternative strategy of building MSCPs and using of off-site car parking (potentially including Heathfield) provide other ways of meeting the car parking requirements.
- 6.2.4. BAL would prefer to use low-cost open land for car parking as this improves the profitability of their activities but this is not a reason to release green belt land for development. It is not a function of planning policy and implementation to underwrite and support a flawed business model.

### 6.3. Comments

- 6.3.1. Please read our original submission
- 6.3.2. The green belt is connected with the Airport's low-cost car parking strategy which is unsustainable and encourages people to fly. It is also a major part of the Airport's revenue scheme. The green belt is close to a Special Area of Conservation which is home to Greater and Lesser Horseshoe bats, protected species which forage within the area of the green belt. Clearly, car parking has a significant effect on foraging habitats.
- 6.3.3. Mitigation through replacement habitat is proposed, which the ES and Officers Report to the Planning and Regulatory Committee concluded would compensate for habitat loss. The replacement land has still not been assessed. The report to the original ES states that to accommodate bats foraging, trees would be required to be cut down to allow bat corridors for the species. It is unknown whether there is sufficient insect life to support additional bats from the Kingswood SAC as well as that of the Brockley SAC. Without this evidence it is impossible to state whether or not there would be a net gain from the replacement habitat.
- 6.3.4. The Officers Report states "*the year-round use of the seasonal car park and additional surface car park are however 'inappropriate' development in the Green belt, which are harmful to the Green Belt by definition.*" But the Addendum to the ES does not comment any further on the harm the car parking will do to the green belt nor is there any comment on the low cost car parking strategy which creates the harm. As stated above, the low cost car parking strategy is unsustainable in a low carbon economy. An alternative to car parking on the green belt has come forward with the Heathfield Park application.
- 6.3.5. In the Report to North Somerset Council 2012 by Brian J Sims titled 'Report on the Examination of the North Somerset Council Strategy Development Plan Document'; The Inspector commented on car parking that it '*has relatively little effect on the essential openness or visual*

*amenity of surrounding Green Belt'* . This was in 2012 and before there was a climate and ecological emergency. . Also thinking on the openness of the green belt has evolved and refusals for effects on openness include car parking. There is to be an additional 2,700 car parking spaces in Phase 2. The PCAA questions, as we did in our original submission, at what stage does a car park compromise the openness of the green belt?

6.3.6. The NPPF paragraph 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.'*

#### **6.4. Condition**

6.4.1. Remove all permitted development rights on Bristol Airport to allow full control of development by North Somerset Council.

## **7.Noise**

### **7.1. Summary**

7.2. Refusal Reasons 1 and 2 relate to noise pollution (Appendix B). The PCAA continue to support these reasons for refusal. Our comments on noise should be read in conjunction with comments on air movements from the document titled 'Passenger Forecasts'. Please refer also to the section Noise and Human Health. Our concerns with BAL's assessment of noise include:

7.2.1. The assumptions for growth scenarios are not robust and lead to considerable uncertainty in respect of the conclusions that are drawn. Thus, if the aircraft movements are wrong the data for noise is also incorrect.

7.2.2. The PCAA do not see how noise can decrease (as claimed by BAL) when there is to be a large increase in movements. The updated forecasts show that there will be growth from 61,382 atm (all flights) in 2019 to around 75,500 atm (commercial flights) at 12 mppa in 2030. If we add in the predicted 10,000 'other' movements, the total would be 85,500 movements annually, an increase of approximately 40%.

7.2.3. The proposal to combine night flying quotas for summer and winter into an annual figure is very strongly opposed by local communities. The number of night flights is already more than at Heathrow and BAL's proposal moves in a direction opposite to the one adopted at an increasing number of airports worldwide – night flying should be substantially reduced, moving to a ban.

### **7.3. Comments**

- 7.3.1. The assumptions for growth scenarios proposed are not robust and lead to considerable uncertainty in respect of the conclusions that are drawn. Thus, if the aircraft movements are wrong the data for noise is also incorrect. See section 3.8 for more detail.
- 7.3.2. The mix of aircraft is critical to the level of noise surrounding the airport. BAL takes an over optimistic view of the replacement schedule that airlines will implement. See section 10.11 for more detail.

### **7.4. Main Report EIA Table 6.6**

- 7.4.1. Context - Table 6.6. is used throughout to provide the association between a noise level change and whether the impact is negligible through to very substantial. Note that the only metric used in this assessment is the change in noise level (dB).
- 7.4.2. No reference is provided for Table 6.6. It also appears as Table 7.21 in the original submission, but no reference is given for it here either. In the original submission it is described as 'a potential impact rating for a change in level' (7.9.31) and is said to be based on the IEMA guidance document (ref 49). It states that Table 7.21 'has been accepted in various airport public inquiries' but no reference is provided for this.
- 7.4.3. The IEMA document is exactly what it describes itself as, a guidelines document and hence does not offer any impact assessment tables that can be used as-is. 7.77 of this document explicitly addresses this: 'Following the publication of the draft guidelines in 2002, there was evidence of some confusion over their application. At no time did these guidelines confirm that a certain noise level change equated to a certain semantic description of the magnitude of the noise impact. As indicated above, the assessor must form a view about the appropriate descriptor, taking account of the objective evidence of the expected noise change, and making a professional judgement regarding the effect of the noise impact.'
- 7.4.4. Some discussion is introduced in the IEMA guideline document to illustrate how the impact assessment is not simply an evaluation of the change in noise level (7.75 and 7.76), in a way that seems particularly relevant to the operation of an airport. i.e. reflecting on Table 6.6, no account has been made for the number of events (flights) and their timings (e.g. early morning) in the impact assessment and whether the change is therefore significant or not.
- 7.4.5. In terms of the updated EIA, Table 6.6 and 6.7 make no account for the number or timing of events in their impact assessment.

### **7.5. Consultation: Designation of Bristol Airport as fully Co-ordinated Airport**

- 7.5.1. In November 2019, BAL contacted the Department for Transport requesting formal designation as fully “coordinated” on a permanent year-round basis in accordance with article 3 of the regulation, from the IATA winter 2020/2021 season onwards. This was before the planning application was submitted for determination at the North Somerset Council Planning and Regulatory committee on February 2020 and ratified in March 2020.
- 7.5.2. The planning consent of 10 mppa in 2011 set the following condition: night restrictions limit the number of night movements and noise Quota Count (QC) points operated each season between 23:30 to 06:00 local time. The seasonal night movement limits are 3000 in a summer period and 1000 in a winter period.
- 7.5.3. Becoming a fully co-ordinated airport would lead to likelihood of the combining of the summer and winter movement quotas, with the DfT setting aside the NSC condition outlined above.
- 7.5.4. At the same time, application 18/P/5118/OUT requested permission to combine the 1,000 winter limit and 3,000 summer limit into an annual total. It would mean more night movements in the summer months especially the peak period of July, August and September.
- 7.5.5. A DfT consultation ran from 24 February to 26 June 2020. The PCAA and many parishes responded to the consultation, objecting. Since the consultation has been closed there has been no update on the consultation from the Department of Transport.  
[https://www.gov.uk/government/consultations/bristol-airport-designation-as-a-coordinated-airport?utm\\_source=5e6a489f-b726-4de4-aab5-5d82e14455f3&utm\\_medium=email&utm\\_campaign=govuk-notifications&utm\\_content=daily](https://www.gov.uk/government/consultations/bristol-airport-designation-as-a-coordinated-airport?utm_source=5e6a489f-b726-4de4-aab5-5d82e14455f3&utm_medium=email&utm_campaign=govuk-notifications&utm_content=daily)
- 7.5.6. The Airport failed to inform local communities about its application to the DfT, even via the Airport Consultative Committee.

## **7.6. Shoulder Air Transport Movements between 23.00 - 23.30 and 06.00 – 07.00 hrs**

- 7.6.1. The flights within these two periods, known as ‘shoulder movements’, were set under a condition of the planning consent of 2011 to grow to 10 mppa. There was to be a limit of 10,500 per year. Bristol Airport has now offered to reduce this to 9,500 per year.
- 7.6.2. Please note that the limit set in the condition was a very high number of aircraft movements. Within these two time periods at peak times and weekends there can be a flight every three minutes. To date, the 2019 Operations Monitoring Report shows that in 2019 there were 8,371 aircraft movements. For the Airport to say that they have reduced the number of night flights is disingenuous when those movements have never yet occurred.

7.6.3. The PCAA do not see how noise can decrease when there is to be a large increase in atm's. The updated forecasts show that there will be growth from 61,382 atm (all flights) in 2019 to around 75,500 atm (commercial flights) at 12 mppa in 2030. If we add in the predicted 10,000 'other' movements, the total would be 85,500 movements annually, an increase of approximately 40%.

## **7.7. Night Noise**

7.7.1. Table 6.2 of the Main Report shows that the current air transport movements in the shoulder period from 23.00 – 23.30 and 06.00 - 07.00 hrs are to be reduced from 10,500 movements to 9,500 movements per year. It is very disingenuous for the Airport to state there will be fewer night flights for the following reasons:

7.7.1.1. Atm's in the Shoulder period were set as a condition in the planning consent of 2011 with a very high limit.

7.7.1.2. The Airport has not reached the limit and would find it hard to do so as the hour of 06.00 – 07.00 is usually already at capacity with a flight every three minutes.

7.7.1.3. In 2019 there were 8,371 aircraft movements during the 'shoulder periods' of 06:00 - 07:00 and 23:00 - 23:30 at 9 mppa.

7.7.1.4. There were 5,082 movements between the hours of 06:00 and 07:00 and between 23:00 and 23:30 in 2017 compared with 5,182 in 2016.

7.7.1.5. As the appendices state, the new aircraft, once delivered, reduce the number of atm's required due to carrying an increased number of passengers which will also reduce flights within the shoulder period.

# **8. Air Quality**

## **8.1. Summary**

8.1.1. Refusal Reason 2 relates to air quality (Appendix B). The PCAA continues to support this reason for refusal. Comments on air quality should be read alongside our comments on air transport from the document titled 'Passenger Forecasts'. Our concerns with BAL's assessment of noise include:

8.1.1.1. The assumptions for growth scenarios are not robust and lead to considerable uncertainty in respect of the conclusions that are drawn. Thus, if the aircraft movements are wrong the data for air quality is also incorrect. More detail is given under section 3.8



## **8.2. Comments**

- 8.2.1. No data has been given showing the impacts on air quality round the Airport from the first lock down which commenced in March 2020. This would give a more accurate assessment of the contribution coming from airport operations.
- 8.2.2. BAL states that air quality will remain within Government guidelines but will become poorer. Air quality should and must be retained at least at the level of 2017, the baseline year. It is a cause of concern that parts of Felton Common close to the A38 are predicted to exceed the limit value for annual mean NO<sub>x</sub>. Acid deposition rates at North Somerset & Mendip Bats 1 SAC and North Somerset & Mendip Bats 2 SAC, are predicted to be higher than the relevant Air Quality Assessment Levels.
- 8.2.3. On 16 December 2020 the Southwark coroner ruled that illegal levels of air pollution, which predominantly came from traffic but which is also particularly relevant to ground and air operations at airports, was responsible for the death of a child. The air pollution caused acute respiratory failure to a person with underlying health issues such as severe asthma. This ruling will have implications for all Local Authorities and City Councils throughout the country. Air pollution surrounding the airport is pushed away from the Airport to other areas by the prevailing south west winds.

# **9. Human Health**

## **9.1. Summary**

- 9.1.1. Refusal Reason 2 relates to human health (Appendix B). The PCAA continues to support this reason for refusal. . Our concerns with BAL's assessment of noise include:
  - 9.1.1.1. The assumptions for growth scenarios are not robust and lead to considerable uncertainty in respect of the conclusions that are drawn. Thus, if the aircraft movements are wrong the data for human health is also incorrect. This is explained further in our comments on air transport from the document titled 'Passenger Forecasts'
  - 9.1.1.2. The PCAA do not believe that the HIA has adequately addressed the questions within our original submission relating to the frequency of air traffic movements affecting tranquillity during the day and sleep disturbance at night which impact on mental and physical health.
    - 9.1.1.2.1. Assumptions on the use of quieter aircraft are highly uncertain

- 9.1.1.2.2. Night flights would increase to 28 or more per night in peak times compared with Heathrow which has 16 and none between 23.30 and 04.30
- 9.1.1.3. Compensation by way of insulation grants is insufficient and at a lower level than many other airports.

## **9.2. WHO Charter**

- 9.2.1. The Non-Technical Summary Addendum point 4.6.3 concludes that *‘Overall, there would be no significant adverse effects to health’*. This is contrary to the reason for refusal 2 which states:
  - 9.2.1.1. *‘The noise and impact on air quality generated by the increase in aircraft movements and in particular the proposed lifting of seasonal restrictions on night flights would have a significant adverse impact on the health and well-being of residents in local communities and the proposed development would not contribute to improving the health and well-being of the local population contrary to policies CS3, CS23 and CS26 of the North Somerset Core Strategy 2017’*
- 9.2.2. The PCAA note that the HIA makes no mention of the World Health Organization (WHO) Charter on Transport, Environment and Health to which the UK is a signatory, and which commits the Government to:
  - 9.2.2.1. "... ensure that the wellbeing of our communities is put first when preparing and making decisions regarding transport and infrastructure policies"
- 9.2.3. 'Charter on Transport, Environment and Health', WHO, 1999 (CD23.32)' Ibid, Preamble, para 2. Policy CS26 of the North Somerset Local Strategy requires
  - 9.2.3.1. *‘Health Impact Assessments (HIA) on all large scale developments in the district that assess how the development will contribute to improving the health and well-being of the local population’.*

## **9.3. Air Quality and Human Health**

- 9.3.1. The Non-Technical Addendum states
  - 9.3.1.1. *‘The assessment has concluded that all pollutants would remain well within the Government’s Air Quality Objectives, and annual mean PM2.5 concentrations would also be below the World Health Organization’s guidelines at all but two receptors. A total of fourteen receptors would experience ‘slight adverse’ effects due to increases in annual mean NO2 which would be not significant.’*
- 9.3.2. Local air quality is adversely affected by pollution from both aircraft and airport-related road traffic. If the Proposals were approved it would mean 20% more flights and 82.5% of all passengers travelling to and from the Airport by car. There would clearly be more pollution.

- 9.3.3. Health risks arise in particular from emissions of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>). PM<sub>2.5</sub> is closely associated with increased risk of respiratory disease. Fine particles can enter deep into the lungs and cause increased risk of heart attacks, strokes and cancer. Recent research has shown there is no safe limit for PM<sub>2.5</sub><sup>1</sup> and that air pollution caused by PM<sub>2.5</sub> can shorten life expectancy by more than a year. 'The cost of air pollution to Health', Wei Y, Wang Y, Di Q et al, BMJ, 30 Nov 2019 (CD.23.28)
- 9.3.4. The results of the latest research confirm previously established associations between PM<sub>2.5</sub> and respiratory and cardiovascular diseases, as well as Parkinson's and diabetes. Apte J et al, University of Texas, published in 'Environmental Science & Technology', Aug 2018. <https://www.sciencedaily.com/releases/2018/08/180822112406.htm>
- 9.3.5. There is an assumption within the ES that the ban in 2030 on the purchase of new petrol and diesel cars will to some degree mitigate air quality but there is no certainty of take up of electric cars and many diesel and petrol cars will still remain in use.

#### **9.4. Noise and Human Health**

- 9.4.1. Bristol Airport is situated in rural surroundings where people have chosen to live to enjoy the quality of life and tranquillity afforded by low background noise levels. The Proposals will give rise to a significant increase in the number of aircraft movements that will adversely affect the noise environment around the airport and under flight paths, thus impact on the quality of health and well-being.
- 9.4.2. People hear aircraft noise as a discrete number of noisy events with associated noise levels, durations and noise characteristics compared to the background or ambient noise levels. People do not perceive aircraft noise as an equivalent noise level averaged over 16 hours in the day and 8 hours at night as modelled.
- 9.4.3. Point 9.5.19 of the Main Report states '*For noise, the main potential health outcomes are cardiovascular health, mental health conditions (e.g. stress, anxiety or depression), sleep disturbance and cognitive performance in children*'. There is clear evidence of the health risks of aircraft noise on those living close to airports, for example, people may experience cardiovascular damage – see, e.g. the Schmidt study. Schmidt F et al. 'Night-time aircraft noise impairs endothelial function and increases blood pressure in patients with or at high risk for coronary artery disease'. Clin Res Cardiol. 22 Aug 2014. DOI 10.1007/s00392-014-0751-x.
- 9.4.4. There is also clear evidence of the adverse impacts of aircraft noise upon schoolchildren's education and, thereby, their wellbeing and life prospects detailed in the report titled 'Health Effect of Noise Exposure'. <https://link.springer.com/article/10.1007/s40572-015-0044-1>

- 9.4.5. The HIA assumes that the planes operating from Bristol will in future be far less noisy than today's planes but there is considerable doubt as to the timetable. The introduction of so-called 'quieter' planes is in any event a disingenuous concept since all aircraft are inherently noisy; it is more accurate to say that some are less noisy than others
- 9.4.6. The main Report point 6.4.2 states that *'The forecasts used for the original ES contained three "modernised" aircraft for which reasonable assumptions were made based on information available at the time relating to their noise characteristics as they were not then in service at Bristol Airport. These were the Airbus A320neo, the Airbus A321neo, and the Boeing 737 MAX 8. In service data is now available for the two Airbus aircraft, and data measured at Bristol Airport's Noise Monitoring Terminals (NMTs) in 2019 has been used to update the assumptions made for these aircraft. The main effect of these changes is that the two Airbus aircraft are now being modelled as louder than they were in the original ES, by approximately 1 dB for arrivals and 3 dB for departures.'*
- 9.4.7. This shows that the noise benefits promised by the sector are disingenuous. In any event, any reduction in aircraft noise derived from advances in technology should be used to lessen the adverse health impacts upon local communities rather than as a justification for more flights.
- 9.4.8. The Main Report does make reference to the WHO Guidelines which contain the following recommendations: *"For average noise exposure, the GDG (Guideline Development Group) strongly recommends reducing noise levels produced by aircraft below 45 dB Lden, as aircraft noise above this level is associated with adverse health effects" and "For night noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft during night-time below 40 dB Lnight, as night-time aircraft noise above this level is associated with adverse effects on sleep"*.
- 9.4.9. Bristol Airport acknowledged in point 6.2.10 that achieving this noise level is almost impossible, as just *'10 aircraft events during the daytime (07:00-19:00) period (or smaller numbers in the evening and night periods) would expose a similar number of people to noise levels in excess of the 45 dB Lden parameter'*. Note that people hear noise well above these levels as the average number of movements per hour is 8 plus.
- 9.4.10. The Aviation Policy Framework ('APF') dated March 2013, point 3.3 states
- 9.4.10.1. *"The Government recognises that noise is the primary concern of local communities near airports and we take its impact seriously. As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the*

*industry must continue to reduce and mitigate noise as airport capacity grows”.*

9.4.11. NPPF February 2019 states that airports need to:

9.4.11.1. *“mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”*

## **9.5. Night Noise and Human Health**

9.5.1. Report titled ‘Airplane noise at night can trigger cardiovascular death’.

<https://www.unibas.ch/en/News-Events/News/Uni-Research/Airplane-noise-at-night-can-trigger-cardiovascular-death.html>

9.5.2. The Airport continues to ignore the requests from local parishes for a reduction in night time air transport movements. The noise addendum fails to consider the actual arrival and departure times of air transport movements between the period of 23.30 - 06.00 hrs. Previous submitted evidence from the PCCA showed that there could be 17 – 22 or more night flights within the summer period, with some flights at regular intervals of 15 minutes. The Mott MacDonald report titled ‘Forecast Validation’ 2018 within the planning statement to the application predicts that in the peak summer there could be 28 night movements. It could be higher with delayed flights and non-scheduled ad hoc night use. Use of available night movements in summer seasons has grown since 2013 as the airport’s traffic recovered from the recession of 2008. In summer 2017 use was 99.7% of the available 3000-night movements, whereas winter season utilisation is less than 30% on average over recent years. 90% of annual night flights occur in a summer season.

9.5.3. Night flying at Bristol is driven by the low cost carriers which carry out short haul operations such as Easyjet, Ryanair and Jet2 which commences flights from Bristol on 1 April 2021. These airlines perform four return trips with the first departure between 06.00 and 07.00 but to achieve four return trips the last flight needs to arrive back during the defined night period of 23.30 – 06.00. It is obvious that unless these carriers can operate within the night period growth at the Airport will be slower. If this condition is removed it will be at the expense of the local communities’ health and well-being.

9.5.4. On 3 December 2020 the Department for Transport published a Night Flights Consultation for the South East airports of Heathrow, Gatwick and Stansted. The current situation at Heathrow Airport is that it has 3,250 night flights in the summer season which is approximately 16 flights per night on average. It also has no flights scheduled between 23.30 - 04.30 and prevents flights scheduled between 04.30 – 06.00, from landing. This is to allow residents to have some hours of sleep free from flight disturbance. Furthermore, the PCAA understand that night flights are set to be completely banned at Heathrow within the next ten years as a

condition of any expansion. Bristol Airport's desire to combine the winter month limit of 1,000 atm with the summer movement limit of 3,000 to allow an increased number of movements in the summer months is a move in the wrong direction.

<https://www.gov.uk/government/consultations/night-flight-restrictions-at-heathrow-gatwick-and-stansted-airports-between-2022-and-2024-plus-future-night-flight-policy>

- 9.5.5. Bristol Airport needs to demonstrate a similar number of hours in the summer months free of air transport movements with a reduced number of night flights moving to no night flights at all. Further evidence on night noise was in an article in The Times dated 21/12/20/ with the headline 'Night Noise raises heart risk'. The article refers to a paper in the European Heart Journal available at

<https://academic.oup.com/eurheartj/advance-article/doi/10.1093/eurheartj/ehaa957/6007462#>

- 9.5.6. The PCAA note from the Main Report point 6.2.10 that even a single Airbus A320 or Boeing 737-800 aircraft operating once per night would expose hundreds of people to noise levels in excess of the guideline 40 dB Lnight value at Bristol Airport, despite its relatively rural location.

## **9.6. Mitigation of noise**

- 9.6.1. Mitigation of noise is to be through planning conditions with BAL committing to a higher proportion of modern (less noisy) aircraft being based at Bristol. The PCAA question how this planning condition will work in practice when it is not in the power of the local Authority or Bristol Airport to make airlines operate the most efficient, clean and less-noisy aircrafts. These aircraft are sought at every airport and particularly at airports which are seeking to expand. It is a meaningless condition.

- 9.6.2. Although the current noise insulation grant scheme is improved, it fails to address the fact that residents on hot summer nights like to sleep with their windows open. The noise insulation does not cover the cost of insulating all rooms within a dwelling and often fails to cover even all the bedrooms. It is up to the owner to make up the cost of the insulation. There is no analysis of the true cost of noise from lack of enjoyment of garden and the local countryside such as Felton Common and the Goblin Combe woods. Please see Section titled Compensation and the Treasury Green Book P133 of our original submission for more information. The PCAA notes that the Treasury Green Book was updated November 2020.

- 9.6.3. BAL has increased the proposed financial mitigation scheme for noise insulation. For instance the sum of £7,500 per dwelling in the 63 dB LAeq 16 hr day time noise contour which would equate to the cost of fitting about five acoustic windows. The Stansted application is offering

£8000 per dwelling in both 63 dB and 60 dB LAeq, 16hr contours. Neither scheme proposed by these airports mitigate the true cost of airport noise.

## **9.7. Community Identity**

- 9.7.1. The PCAA view the point 9.5.44 on community cohesion as extraordinary. *‘For community identity effects, the main potential health outcomes are associated with mental health conditions (e.g. stress, anxiety or depression) due to underlying social determinants influencing community cohesion. The expansion of Bristol Airport would be in the context of a population already accustomed to airport and aviation activity. For the majority of people near to Bristol Airport, the airport is already a prominent feature of the natural, cultural and economic landscape, including through views, employment and ease of access to national and international travel. The operational changes to views and the increased influence of Bristol Airport on the identity of surrounding communities should be considered long-term effects.*
- 9.7.2. The planning application for further growth has brought parishes together and created a consensus view that any further expansion must not go ahead. The pandemic has highlighted the value of open spaces without air and noise pollution. The surrounding area, unlike Crawley, close to Gatwick is not dependent on the Airport. Communities near the Airport fear its increasing dominance on the rural landscape and fear the implications for the future.
- 9.7.3. The PCAA cannot see how the impacts of the proposed operational changes on the identity of parishes should be considered long-term effects. The PCAA objected to growth to 10 mppa. Stop Bristol Airport Expansion group took Bristol Airport to the High Court in February 2011 in order to prevent growth to 10 mppa. Within this time frame there has been constant incremental growth of air transport movements and car movements to and from the Airport as well as significant changes to the landscape, such as the construction of a three storey administration block in a rural greenbelt location. The incremental impacts combine to form a cumulative impact which the HIA has failed to consider. These are impacts of growth to 10 mppa with the aggregate effects of noise, air quality and road traffic. Airport light pollution can also have a significant adverse health impact, causing sleep disturbance for those living close to the airport.

## **9.8. Climate Change and Human Health**

- 9.8.1. NSC’s March 2020 Committee Report made the following statement in relation to the original ES health chapter assessment of operational climate change effects: *“The HIA suggests that the change arising from the proposed development would not be significant in the context of UK’s climate change obligations ... They consider the significance of the effect*

*would be negligible for the general population and minor adverse for vulnerable groups.'*

9.8.2. The above statement is contrary to the views of the Planning and Regulatory Committee as well as the thousands of objectors who commented on the Environmental Statements.

9.8.3. The PCAA continue to support refusal reason 3:

9.8.3.1. *"The scale of greenhouse gas emissions generated by the proposed increase in passenger numbers would not reduce carbon emissions and would not contribute to the transition to a low carbon future and would exacerbate climate change contrary to the National Planning Policy Framework, policy CS1 of the North Somerset Core Strategy 2017 and the duty in the Climate Change Act 2008 (as amended) to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline".*

9.8.4. It is obvious that if these targets are not met, there will be health impacts on communities and individuals. Hugh Montgomery Co-Chair of the Lancet Commission recognises the impacts of climate change on public health and he coined the phrase 'climate change is a medical emergency'. It is thus disappointing that the Main Report point 9.5.58 recognises that for *'climate change, the main potential health outcomes (globally) are heat-related disorders, respiratory disorders, infectious diseases, food insecurity and mental stress associated with natural disasters. Adverse effects fall most heavily on the poorest and most vulnerable members and regions of society (globally)'*. It fails to recognise the health impacts locally, for instance, flooding. Somerset was heavily flooded in 2012/13 and very close to the Airport a man died at Chew Stoke also because of flooding. In August 2003 the heat wave caused over 2,000 deaths. Both flooding and heat waves are going to become more common in the UK and will impact directly on communities round the Airport.

9.8.5. Bristol Airport plans to move into the long haul market subject to the runway length constraint as it is the second shortest runway in England. The impacts of long haul include unintended consequences on the spread of infectious diseases, such as COVID-19, and Sars. There will inevitably be increased risk of passengers arriving at Bristol with emerging infections and transmitting them to airport employees, the local communities and on those using public transport.

## **9.9. Conditions**

9.9.1. For health reasons it is necessary to:

9.9.1.1. Retain or reduce the current summer 3,000 and winter 1,000 movement night limit

9.9.1.2. Retain the current condition on Stands 38 and 39 between the hours of 23.00 – 06.00.



# 10. Climate Change – Carbon & other Greenhouse Gas Emissions

## 10.1. Summary

- 10.1.1. Refusal Reason 3 relates to greenhouse gas emissions (Appendix B). The PCAA continues to support this reason for refusal. Our concerns with BAL's assessment of noise include:
  - 10.1.1.1. BAL needs to demonstrate that there is still room for expansion within the carbon budget and to demonstrate how their emissions fit within other expanding airports such as Gatwick, Leeds, Luton, Stansted and Southampton. In other words no cumulative assessment has been carried out with other regional airports or airports in the South East.
  - 10.1.1.2. BAL has used the planning assumption that aviation emissions should be restricted to 37.5MtCO<sub>2</sub>/yr instead of the target connected with the Net Zero policy which implies a limit of 30MtCO<sub>2</sub>/yr
  - 10.1.1.3. There is uncertainty around BAL's emissions data but their documents do not provide the information to enable their calculations to be validated.
  - 10.1.1.4. The future mix of aircraft types is highly uncertain and beyond the influence of BAL. Fuel efficiencies are progressing but aircraft have a life of around 22 years and following financial strain owing to Covid airlines are unlikely to replace aircraft as quickly as they might have done previously.
  - 10.1.1.5. BAL ignores any non-CO<sub>2</sub> contributors to climate change although, for example, an article published in September 2020 concerns the contribution of global aviation to anthropogenic climate forcing for 2000 to 2018 and indicates that non-CO<sub>2</sub> impacts are twice as large as the CO<sub>2</sub> alone
  - 10.1.1.6. BAL has not yet published their Carbon and Climate Change Action Plan and we question how a decision to expand can be made before this is established. From what they have said to date we expect them to be using offsetting as a way of meeting the carbon budget for aviation. However, the CCC advice is that CORSIA should not be used to meet carbon budgets but there should be reduced emissions, in their words '*no net expansion*' of airports.

## 10.2. Policy Framework

- 10.2.1. In March 2013 the Government published the 'Aviation Policy Framework' ('APF') White Paper which includes the objective of ensuring

"that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions"

10.2.2. In April 2018 the DfT published 'Beyond the Horizon: The Future of UK Aviation – Next Steps towards an Aviation Strategy'. This marked the start of a consultation, which is still on going, for a new Aviation White Paper.

10.2.3. The DfT has stated that it: "... will investigate what technical and policy measures are available to address aviation emissions and what their combined impact could be. It will then consider what the possible combination of measures could be through to 2050 and how that relates to the recommendation of the Committee on Climate Change"

10.2.4. A new Aviation Recovery Plan is expected in early in 2021 which will update the green paper 2018: The Future of UK Aviation 'Aviation Policy Framework', 'DfT, Mar 2013 (CD14.1), para 12. 'Beyond the horizon ... Next Steps towards an Aviation Strategy', DfT, Apr 2018 (CD14.47), para 6.18.

### 10.3. **Paris Agreement**

10.3.1. In December 2015, the parties to the UNFCCC concluded the Paris Agreement and this was ratified in November 2016. The Paris Agreement is the first comprehensive global treaty that sets temperature-based goals for limiting global warming. Article 2 of the Agreement commits the Parties collectively to hold global temperature increases to "well below 2°C" above pre-industrial levels, and to pursue efforts to limit the temperature increase to 1.5°C. Article 4(1) of the Agreement contains commitments for global emissions to peak as soon as possible and decline rapidly thereafter to reach Net Zero in the second half of the century.

10.3.2. To achieve these goals, Article 4(2) requires each Party to prepare a 'nationally determined contribution' ('NDC') and Article 4(3) requires successive NDCs to reflect each Party's 'highest possible ambition'

### 10.4. **The Ten Point Plan for a Green Revolution point 6 is tilted ' Jet Zero and Green Ships'**

10.4.1. The ten point plan was published in November and considers two points relevant to aviation, sustainable aviation fuels and investments in research and development to develop zero-emission aircraft.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/936567/10\\_POINT\\_PLAN\\_BOOKLET.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf)

### 10.5. **Nationally Determined Contribution**

- 10.5.1. The UK Government announced on 3 December its own NDC target to reduce emissions by 68% by 2030 compared to 1990 levels. This target does not include aviation and shipping emissions. <https://www.gov.uk/government/publications/the-uks-nationally-determined-contribution-communication-to-the-unfccc>
- 10.6. **Sixth Carbon Budget 2033 – 2037**
- 10.6.1. The Sixth Carbon Budget titled the ‘The UKs path to Net Zero’ was published on 9 December by the Committee on Climate Change. The report recommends that the Government reduce demand from carbon activities such as flying and recommends that aviation and shipping emissions should be included in the sixth budget. This is expected in 2021. <https://www.theccc.org.uk/publication/sixth-carbon-budget/>
- 10.7. **Heathrow ruling**
- 10.7.1. On 16 December 2020, the Supreme Court ruled in favour of Heathrow Airport. The Court case was on the lawfulness of the Airports National Policy Statement (the “ANPS”) and its accompanying environmental report. The ANPS is the national policy framework which governs the construction of a third runway at Heathrow Airport. The Court decided that the only relevant Climate Change legislation was the Climate Change Act 2008, and that the third runway could go ahead. But Heathrow will have to show within its application for a Development Consent Order that it would be compatible with the up-to-date requirements under the Paris Agreement and the CCA 2008 measures as amended to take into account the Net Zero emissions target. The Climate Change Act of 2008 was amended in June 2019.
- 10.8. **Interim Report – Net Zero Review - by the Treasury**
- 10.8.1. On 17 December, the Treasury published the interim report titled ‘Net Zero Review: Interim Report’. The final report is to be published in 2021. It states:
- 10.8.1.1. *"The government has announced it will introduce a domestic emissions trading scheme covering heavy industry, power generation and aviation after the UK leaves the EU."*
- 10.8.1.2. *Carbon pricing: After the UK leaves the EU Emissions Trading System (ETS), the government will introduce a domestic UK ETS covering heavy industry, power generation and aviation, with a cap on emissions that decreases over time."*
- 10.8.1.3. *"Emissions from international aviation and shipping have increased by nearly 90%, entirely due to aviation."*
- 10.8.1.4. **“Air travel:** *The cost to third parties from the emissions of air travel is a negative externality in the absence of intervention, as it*

*not reflected in the market price. Decarbonisation of the sector in the short term is largely reliant on fuel-efficiency improvements and reduced demand. There are currently no truly zero-emission solutions for long-haul flights. However, small hydrogen and electric planes are being developed, which could be viable on short and medium-haul flights before 2050. Given that significant technological development is required in this sector, dynamic market failures will play a significant role. Sustainable aviation fuels present a way to reduce emissions from aviation and production could be scaled over the next ten years to achieve meaningful carbon savings in the decade from 2030. However, these fuels are currently more costly than existing aviation fuels. As fuel costs make up a significant proportion of airlines' costs and the sector is highly competitive, there is currently little incentive to move away from conventional fuels until there is price parity with sustainable fuel cost. International cooperation is also necessary to overcome potential coordination failures".*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945827/Net\\_Zero\\_Review\\_interim\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945827/Net_Zero_Review_interim_report.pdf)

#### **10.9. Aviation Emissions**

10.9.1. The slower growth scenario falls into the Sixth Carbon Budget 2033 - 2037 published on 9 December which sets out the pathway to the Net Zero Emissions target. Within the pathway the CCC recommends the inclusion of international aviation in the carbon budget. The CCC also states on airport expansion and recommends 'no net expansion' of UK airport capacity. If airport expansion does occur at one airport, it would require capacity restrictions elsewhere in the UK. It is our understanding that the 3<sup>rd</sup> runway at Heathrow uses up the entirety of the carbon budget available. BAL needs to demonstrate that there is still room for expansion within the carbon budget. BAL also needs to demonstrate how their emissions fit within other expanding airports such as Gatwick, Leeds, Luton, Stansted and Southampton. No cumulative assessment has been carried out with other regional airports or airports in the South East. A request for further environmental Information under reg 25 of the Regulations setting out a cumulative impact assessment of the Proposal in line with the third Heathrow Runway and other airport applications for expansion should be made by PINS.

#### **10.10. Department for Transport (2017), UK Aviation Forecasts**

10.10.1. The Department for Transport Aviation models in 2017 were used to model the aviation sector's future emissions. Note that the model did not include provision for the expansion of Bristol Airport. It remained capped at 10 mppa. As such, any additional flights created by the

expansion would add to the sector's emissions total. BAL needs to demonstrate how emissions fit within the DfT forecasts.

**Table 2: Bristol Airport Forecasts- CO2, passenger numbers and air transport movements**

With Development (12 mppa)						
	Passengers (millions)	Commercial Movements	Positioning Movements	Other Movements	Total Movements	Upper emissions
2017	8.2				76,212	472.45
2024	10.3	67,630	600	10,040	78,270	513.28
2030	12	75,340	600	10,040	85,980	552.27
2040	12	75,340	600	10,040	85,980	542.69
2050						488.29
Without Development (10 mppa)						
	Passengers (millions)	Commercial Movements	Positioning Movements	Other Movements	Total Movements	Upper emissions
2017	8.2				76,212	472.45
2024	10	65,670	600	10,040	76,310	475.5
2030	10	63,730	600	10,040	74,370	464.56
2040	10	63,750	600	10,040	74,390	456.41
2050						410.65

10.10.2. We have asked for an expert review of these calculations but in order to verify the emissions data shown in the table, information is required on the actual aircraft movements of the base line year 2017 including plane types, flight counts and destinations. However, at no point do BAL actually present the data by which the 2017 baseline can be verified or compared.

10.10.3. A request was made to the Airport for this information. A response was received on 16 December stating '*The 2017 data you refer to is not presented in the original ES or the ES Addendum because it does not relate to the future assessment (with or without development). The aviation movements and destinations for the future assessment year were presented in Appendix 17A of the original ES and subsequently updated in Appendix 10A of the ES Addendum. However, the AMR for 2017 contains further details on aircraft mix, so this may contain the information you are looking for.*

*Should you have any further queries on the ES Addendum consultation, it would be preferable for you to raise any queries direct with North Somerset Council as they are running the consultation and therefore should have sight of all correspondence.'*

10.10.4. An email was sent to North Somerset Council on 18 December requesting this information.

10.10.5. PINS should request BAL provide this information under reg 25 of the Regulations so all parties to the inquiry can ensure that they understand the baseline that BAL are working from.

#### 10.11. **Future Fleet Mix**

10.11.1. The emissions figures are dependent on the future fleet mix of aircraft. Section 4.3 of passenger forecasts outlines the fleet mix according to growth scenarios.

10.11.2. Point 4.9 states, for the slower growth case: *'However, it is likely that by 2034, slightly more operations could be by newer generation aircraft, such as the Airbus 'Neo' and Boeing 'Max' families, than projected in 2030 in the Core Case'*. Point 4.10 for the faster growth case: *'However, under these circumstances we believe from our consultations with the airlines that there would still be some accelerated growth in aircraft size ahead of the Core Case as airlines would seek to maximise efficiency on core routes by using larger aircraft where possible.'*

10.11.3. The fleet mix for Jet 2 which will be operating from Bristol Airport from April 2021, has not been considered within BAL's documents. The current fleet mix is predominantly older generation aircraft.

10.11.4. There are too many assumptions to give any certainty of the fleet mix in growth to 12 mppa, thus the emissions figures are uncertain as well. This will also apply to air quality and noise data.

#### 10.12. **Length of service of a low carrier aircraft**

10.12.1. The DfT has calculated that the average service life for passenger aircraft in the UK is 22 years for low-cost carriers. Table 2 shows that emissions fall from 2040 onwards. This seems impossible with the life expectancy of an aircraft being 22 years and the fleet mix only becoming operational within the next 10 plus year. Point 4.6 on re-fleeting strategies states *'We do not believe that the rate of change in average aircraft size will be as quick as seen recently'*. This again questions the accuracy of the figures.

#### 10.13. **Sixth Carbon Budget Energy Efficiency Improvements**

10.13.1. The Sixth Carbon Budget for net emissions trajectory expects a fuel efficiency improvement of 1.4% annum which has changed from a



previous improvement rate of 0.7%. However, if an aircraft is replaced on average every 22 years when are these energy efficiencies going to be achieved? Electric aircraft are still only on the horizon. The Technical Report issued by the CCC at the same time as the Net Zero Advice added the following points on electric planes.

*'Some deployment of hybrid-electric aircraft may be possible in the 2040s, but will make up less than 10% of the kilometres flown in 2050; and*

*Aircraft are operational for 20-30 years. All new aircraft would need to be zero carbon from 2030 or before for the entire fleet to be zero-carbon by 2050'* <https://www.theccc.org.uk/publication/net-zero-technical-report/>

#### 10.14. **Bristol Airport Master Plan**

10.14.1. A consultation was held in May 2018 titled 'Your Airport: Your Views, towards 2050'. This showed growth to 12 mppa but eventually arriving at 20 mppa in the 2040's. Growth was to be phased at 2 mppa, 3 mppa and 5 mppa. Note that no aviation emission has been shown for any development beyond 12 mppa growth.

10.14.2. Overall there are just too many assumptions within the aviation emission figures to enable the decision process to be carried out.  
<https://www.google.com/search?q=bristol+Airport+Your+Airport+your+views&oq=bristol+Airport+Your+Airport+your+views&aqs=chrome..69i57j9021j0j7&sourceid=chrome&ie=UTF-8>

#### 10.15. **Low Air fares**

10.15.1. BALs business model is dependent on low air fares delivered by the low cost carriers for the leisure market. Bristol Airport is a leisure airport with only 15% of the passenger throughput on business travel which is likely to fall if the airport grows. Jet2 is to commence operations at Bristol Airport from 2021 and the destinations are typical tourist destinations. Appendix D shows the list of holiday destination Jet2 is offering.

10.15.2. The Committee on Climate Change in the Aviation Summary to the Sixth Carbon Budget 2033 – 2037 raises low fares under 'demand management'. The report shows demand management policies could take several forms, either reducing passenger demand for flying through carbon pricing, a frequent flyer levy, fuel duty, VAT or reforms to Air Passenger Duty (APD), and/or restricting the availability of flights through management of airport capacity'. Many of the proposals suggest air fares could rise in the future from a) frequent flyer levy b) an increase in carbon pricing c) an increase in fuel prices. The passenger traffic forecasts addendum has shown prices for carbon, fuel and air passenger duty to 2050. It is unclear whether BAL's projections for future passenger

numbers include the impact of likely demand management policies. But it is questionable if the increase suggested will reduce passenger numbers and thus air transport movements. More detail is required.

#### 10.16. **Non-CO2 Emissions**

10.16.1. The addendum continues to leave out any assessment of non-CO2 climate impacts like air contrails on the basis of scientific uncertainty. The CCC recommends that these non-CO2 emissions should be reported in order that it is known that they are part of aviation's impact on the climate. This is reflected in the Precautionary Principle to safeguard health and the environment. New studies have recently been published in the last few months on the impact of non-CO2 emissions. For example, published September 2020 is the report titled 'The contribution of global aviation to anthropogenic climate forcing for 2000 to 2018. The study indicates that non-CO2 impacts are twice as large as the CO2 alone.

<https://www.sciencedirect.com/science/article/pii/S1352231020305689>

#### 10.17. **CORSIA**

10.17.1. Currently the aviation sector is relying on offsetting for international emissions to allow further growth at airports including Bristol Airport. Much of the detail regarding offsetting is still to be announced and it is not clear how or whether the offsets available under CORSIA will be limited to robust and genuinely additional carbon offsets. The CORSIA target was initially to stabilise net emissions at an average of 2019-2020 levels. Due to COVID this has been amended to 2019. However, on current industry forecasts, the global aviation sector will take 3 to 5 years to recover to 2019 levels of traffic. CORSIA is planned to come into effect on a voluntary basis in 2021 and, in the early years of the scheme, airlines will therefore not be required to do anything, as emissions are likely to remain below 2019 levels, and the scheme will not impose any carbon price on the sector during this phase. CORSIA is set to become mandatory by 2027 and end in 2035.

10.17.2. The Report titled 'International aviation and the Paris Agreement temperature goals' by Professor Lee of Manchester Metropolitan University shows clearly the failure of CORSIA

10.17.2.1. "There are two issues associated with offsetting in the near and long term that need to be understood:

10.17.2.1.1. offsetting from reforestation and afforestation has a built-in time delay of years to decades;



10.17.2.1.2. *over-reliance on future ‘negative emissions technologies’ (NETs) needs to be avoided when considering the future growth of aviation.”*

10.17.3. The CCC advice is that the CORSIA should not be used to meet carbon budgets but there should be reduced emissions, in their words ‘*no net expansion*’ of airports.

#### 10.18. **Bristol Carbon Road Map – Is Bristol Airport really Carbon Neutral?**

10.18.1. BAL’s ambition is to become a carbon neutral airport by 2025 for Scope 1 and 2 emissions and a net zero airport by 2050 through its Carbon Roadmap published in July 2019.

10.18.2. **The Main Report Point 10.4.4 states** “*The carbon neutral airport 2025 commitment has a greater reliance on offsetting of Scope 1 and 2 emissions, whereas the net zero airport 2050 ambition focuses on reducing Scope 1 and 2 emissions wherever practicable and then offsetting the residual emissions only where necessary*”. To become a carbon neutral airport it is reliant on carbon offsets rather than reducing emissions.

10.18.3. BAL has made the commitment to offset GHG emissions from all passenger surface access journeys to and from the airport from 2020. The West of England combined Authorities update on the Climate Emergency January 2020 shows that in 2019, 32% of all emissions were from transport. This figure excludes motorways, rail and aviation emissions. The Carbon Plan priorities are towards decarbonising public transport, an increase in electric cars and reducing the need for car journeys. Bristol Airport, through expansion, will increase the need for car journeys. It is expected that the delivery of the mass transit corridor which is to bring reduced transport emissions will be constructed by 2036. Note that Bristol Airport has no rail link and that car movements to the airport will remain the dominant mode of travel. The Airport is aiming for a modal public transport split of 17.5%.[https://westofengland-ca.moderngov.co.uk/documents/s1678/15%20-%20Update%20on%20Climate%20emergency%20planning%20update.p](https://westofengland-ca.moderngov.co.uk/documents/s1678/15%20-%20Update%20on%20Climate%20emergency%20planning%20update.pdf)  
[df](https://westofengland-ca.moderngov.co.uk/documents/s1678/15%20-%20Update%20on%20Climate%20emergency%20planning%20update.pdf); <https://apps.n-somerset.gov.uk/Meetings/ByCommittee/14/2019/38>

#### 10.19. **Carbon Offsetting of road travel to and from Bristol Airport**

10.19.1. To offset car travel to the Airport the ‘drop and go’ car park charge increased from £1 to £3 and then again, recently, to £4. This has been done to raise money for offsetting car travel. Although 2020 has been an unusual year with the pandemic, the airport has agreed to offset 180,000 tonnes of carbon with a budget of £250,000. The £250k figure was based on the 2017 baseline from the planning application for surface

access emissions plus an estimated increase as it was covering 2020 (source: Airport Consultative Committee Minutes October 2020).

10.19.2. The move towards offsetting car emissions is welcome although we would request information that identifies the total emissions from vehicle usage to and from the airport so that the figure of 180,000 tonnes can be put in context

10.19.3. The cost per tonne for the carbon offsetting (£1.39) implies a rather low quality offset and certainly not a Gold Standard offset which would be greatly preferred. For comparison, the Government figure for the social cost of carbon is £14 per tonne CO<sub>2</sub>(e).

[www.forestresearch.gov.uk/research/review-of-approaches-to-carbon-valuation-discounting-and-risk-management/current-uk-government-guidance-for-social-value-of-carbon/](http://www.forestresearch.gov.uk/research/review-of-approaches-to-carbon-valuation-discounting-and-risk-management/current-uk-government-guidance-for-social-value-of-carbon/).

#### 10.20. **Airport building and ground operation GHG emissions**

10.20.1. Table 10A.10 *'Airport building and ground operation GHG emissions (ktCO<sub>2</sub>e/yr) for the 'With Development' and 'Without Development' cases under the central emission scenario, using a location-based method for reporting of grid electricity'* omits the baseline figure for heating/red diesel gas oil. The figure for red diesel shown in the 2017 Operations Monitoring Report is 0.21 ktCO<sub>2</sub>eq (kg). At 2050 with development the figure is 0.39 ktCO<sub>2</sub>e/yr. All scenarios given have the same figure for usage of red diesel. This is almost double at a time when all sector are recognising the need to reduce carbon emissions and non- carbon fuels are available to replace red diesel.

<https://www.google.com/search?q=bristol+Airport+Operations+Monitoring+Report+is+Heating+%2F+red+diesel+Gas+oil&oq=bristol+Airport+Operations+Monitoring+Report+is+Heating+%2F+red+diesel+Gas+oil&aqs=cchrome..69i57.20349j0j7&sourceid=chrome&ie=UTF-8>

#### 10.21. **Traffic Emissions**

10.21.1. We have doubts over the accuracy of the traffic projections (see previous section) and have therefore have not been able to comment further on BAL's statements regarding traffic emissions.

*For appendices see following pages*

*Appendix A – Letter from Dr Liam Fox MP*

*Appendix B – Reasons for Refusal by North Somerset Council*

*Appendix C – PCAA Response to Public Transport Interchange application*

*Appendix D – Jet 2 Destinations*

## **Appendix A – Email letter from Dr Liam Fox MP to Grant Shapps MP Secretary of State for Transport.**

DOUGLAS, Ione  
Tue 01/09/2020 16:36

- DFT Ministers

Dear Grant

As you will be aware, North Somerset Council recently rejected proposals by Bristol Airport to seek a further expansion of airport passenger numbers to 12 million per annum. There was widespread concern from across the Council area to a number of the implications of the expansion, including both MPs. I set out my own objections which were largely related to the impact that further passenger numbers would have on the already overcrowded road transport network, since Bristol Airport has one of the poorest access networks of any of our regional airports. There is also no potential for a real link and any improvement to the road infrastructure would be extraordinarily costly, a burden that could only fall on central government.

The CEO of Bristol Airport, Dave Lees, recently informed me that the Airport intended to appeal the decision. I told him that this was entirely understandable from his perspective and I would have been surprised, had he made any other decision. There are, after all, no absolute right and wrongs on planning issues, merely legitimate competing interests affecting business, the environment, travel accessibility and the quality of life of those who live in the region of the airport itself. These issues, and more, will need to be determined under some form of the appeals procedure in the near future.

There is understandable concern amongst community and political groups in North Somerset that the potential exists for a great deal of time, energy and expense to be expended during an appeal process only for the application appeal to be recovered by the Secretary of State's office before the conclusion of the process itself.

There are two possible courses of action that might remedy this problem. The first is an assurance from your office that you will not recover the appeal and will allow it to be heard and decided by the Planning Inspectorate. The second would be that you recover the appeal at the earliest opportunity after the appeal papers have been submitted to North Somerset Council and determine the appeal through an inquiry by your department.

I am very keen that the decision around Bristol Airport's future plans is taken with specific regard to unique local and regional circumstances rather than as part of any broader determination around the expansion plans of regional airports generally.

I would be very grateful to you for any guidance that you might be able to give me in this matter so that I might better advise those in my constituency who have a strong interest in the subject.

Yours sincerely

LIAM FOX  
Parliamentary Office of the Rt Hon Dr Liam Fox MP  
020 7219 4198  
House of Commons, London SW1A 0AA  
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## NOTICE OF DECISION

Town and Country Planning Act 1990



Mr Alexander Melling  
Wood Environment & Infrastructure Solutions UK Ltd  
Redcliff Quay  
120 Redcliff Street  
Bristol  
BS1 6HU

Application Number: 18/P/5118/OUT

Category: Outline application

**Application No:** 18/P/5118/OUT  
**Applicant:** Bristol Airport Limited  
**Site:** Bristol Airport, North Side Road, Felton, Wrington  
**Description:** Outline planning application (with reserved matters details for some elements included and some elements reserved for subsequent approval) for the development of Bristol Airport to enable a throughput of 12 million terminal passengers in any 12 month calendar period, comprising: 2no. extensions to the terminal building and canopies over the forecourt of the main terminal building; erection of new east walkway and pier with vertical circulation cores and pre-board zones; 5m high acoustic timber fence; construction of a new service yard directly north of the western walkway; erection of a multi-storey car park north west of the terminal building with five levels providing approximately 2,150 spaces; enhancement to the internal road system including gyratory road with internal surface car parking and layout changes; enhancements to airside infrastructure including construction of new eastern taxiway link and taxiway widening (and fillets) to the southern edge of Taxiway GOLF; the year-round use of the existing Silver Zone car park extension (Phase 1) with associated permanent (fixed) lighting and CCTV; extension to the Silver Zone car park to provide approximately 2,700 spaces (Phase 2); the provision of on-site renewable energy generation; improvements to the A38; operating within a rolling annualised cap of 4,000 night flights between the hours of 23:30 and 06:00 with no seasonal restrictions; revision to the operation of Stands 38 and 39; and landscaping and associated works.

North Somerset District Council in pursuance of powers under the above mentioned Act hereby **REFUSE** consent for the above development for the following reasons:

- 1 The airport has planning permission to expand to a throughput of 10 million passengers per annum (mppa) which allows for further expansion in passenger growth of approximately 1 mppa above the current passenger level. The further expansion beyond 10mppa now proposed would generate additional noise, traffic and off airport car parking resulting in adverse environmental impacts on communities surrounding

Bristol Airport and which would have an adverse impact on an inadequate surface access infrastructure. The claimed economic benefits arising from the proposal would not outweigh the environmental harm caused by the development contrary to policy CS23 of the North Somerset Core Strategy 2017.

- 2 The noise and impact on air quality generated by the increase in aircraft movements and in particular the proposed lifting of seasonal restrictions on night flights would have a significant adverse impact on the health and well-being of residents in local communities and the proposed development would not contribute to improving the health and well-being of the local population contrary to policies CS3, CS23 and CS26 of the North Somerset Core Strategy 2017
- 3 The scale of greenhouse gas emissions generated by the proposed increase in passenger numbers would not reduce carbon emissions and would not contribute to the transition to a low carbon future and would exacerbate climate change contrary to the National Planning Policy Framework, policy CS1 of the North Somerset Core Strategy 2017. and the duty in the Climate Change Act 2008 (as amended) to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline.
- 4 The proposed extension to the Silver Zone car park and the year round use of the seasonal car park constitute inappropriate development in the Green Belt which is by definition harmful to the Green Belt. There are no very special circumstances which outweigh the harm to the Green Belt caused by reason of inappropriateness and any other harm including the encroachment of development on the countryside and loss of openness contrary to the National Planning Policy Framework and policy DM12 of the Development Management Policies Sites and Policies Plan Part 1 2016.
- 5 The proposed public transport provision is inadequate and will not sufficiently reduce the reliance on the car to access the airport resulting in an unsustainable development contrary to the National Planning Policy Framework and policies CS1 and CS10 of the North Somerset Core Strategy 2017.

#### **Advice Notes:**

- 1 Positive and proactive statement: The council worked with the applicant in a positive and proactive manner and implemented the requirement in section 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, by providing pre-application and post-application advice and publishing statutory consultee and neighbour comments on the council's website. The council also looked for solutions to enable the grant of planning permission and invited amendments and/or additional information be submitted to overcome concerns. However, notwithstanding these efforts the application does not comply with the relevant planning policies and clear reasons have been given to help the applicant understand why planning permission has not been granted

Continued...

- 2 Refused plans/documents: The plans/documents that were formally considered as part of this application are as follows:

**Drawings:**

- o 17090-00-100-400 Location (Red Line) Plan
- o 17090-00-100-401 Composite Site Plan
- o 17090-00-100-402 Site Reference Plan
- o 17090-00-100-403 Existing Site Plan
- o 17090-00-100-404 Existing Site Plan - North
- o 17090-00-100-405 Existing Site Plan - Central
- o 17090-00-100-406 Existing Site Plan - South
- o 17090-00-100-407 Proposed Site Plan
- o 17090-00-100-408 Proposed Site Plan - North
- o 17090-00-100-409 Proposed Site Plan - Central
- o 17090-00-100-410 Proposed Site Plan - South
- o 17090-00-100-411\_01 Permitted Development Rights Reference Site Plan
- o 17090-00-200-400\_00 Ground Floor Plan - Existing
- o 17090-00-200-401\_0 Ground Floor Plan - Proposed
- o 17090-10-200-400\_00 First Floor Plan - Existing
- o 17090-10-200-401\_00 First Floor Plan - Proposed
- o 17090--10-200-400\_00 Basement Floor Plan - Existing
- o 17090--10-200-401\_00 Basement Floor Plan - Proposed
- o 17090-20-200-400\_00 Mezzanine Floor Plan - Existing
- o 17090-20-200-401\_00 Mezzanine Floor Plan - Proposed
- o 17090-ZZ-125-400\_00 Roof Plan - Existing
- o 17090-ZZ-125-401\_00 Roof Plan - Proposed
- o 17090-ZZ-300-400\_00 South Terminal Extension & B1, B2 and B3 - Existing Elevations (Sheet 1 of 2)
- o 17090-ZZ-300-401\_00 South Terminal Extension & B1, B2 and B3 - Proposed Elevations (Sheet 1 of 2)
- o 17090-ZZ-300-402\_00 South Terminal Extension & B1, B2 and B3 - Existing Elevations (Sheet 2 of 2)
- o 17090-ZZ-300-403\_00 South Terminal Extension & B1, B2 and B3 - Proposed Elevations (Sheet 2 of 2)
- o 17090-ZZ-300-404\_00 West Terminal Extension - Existing Elevations
- o 17090-ZZ-300-405\_00 West Terminal Extension - Proposed Elevations
- o 17090-ZZ-300-406\_00 Terminal Canopies - Existing Elevations
- o 17090-ZZ-300-407\_00 Terminal Canopies - Proposed Elevations
- o 40506-Bri075c Integrated/embedded Landscape, Visual and Ecology Mitigation Masterplan
- o C1124-SK-A38-010 11.0 A38 Junction Improvements - Option 10
- o C1124-SK-A38-011 1.0 A38 Junction Improvements - Vehicle Track Analysis 1 of 3
- o C1124-SK-A38-012 1.0 A38 Junction Improvements - Vehicle Track Analysis 2 of 3
- o C1124-SK-A38-013 1.0 A38 Junction Improvements - Vehicle Track Analysis 3 of 3

**Documents:**

- o Planning Statement (including Bristol Airport Forecast Validation) - December 2018
- o Environmental Statement (including Flood Risk Assessment) - December 2018
- o Design and Access Statement - December 2018
- o Consultation Feedback Report - November 2018

- o Economic Impact Assessment - November 2018
- o Transport Assessment - December 2018
- o Draft Workplace Travel Plan - December 2018
- o Parking Demand Study - December 2018
- o Parking Strategy - December 2018
- o Foul and Surface Water Drainage Strategy - December 2018
- o Lighting Impact Assessment - December 2018
- o BREEAM Pre-Assessment - November 2018
- o Response to Request for Further Information Pursuant to Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - April 2019
- o Response to Request for Further Information Pursuant to Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - October 2019
- o Response to North Somerset Council Highways and Transport Comments - December 2019

Date: 19 March 2020  
Signed: Richard Kent  
Head of Development  
Management

Please use our [online contact form](http://www.n-somerset.gov.uk/contactplanning) at [www.n-somerset.gov.uk/contactplanning](http://www.n-somerset.gov.uk/contactplanning) if you require further information on this decision.

## NOTES RELATING TO A DECISION TO REFUSE PERMISSION

These notes are intended as helpful advice. PLEASE READ THEM CAREFULLY.

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### Appeals

If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or by any of the conditions, then you can appeal to the Secretary of State for the Environment in accordance with the provisions of Town and Country Planning Act 1990. If this is a decision to refuse planning permission for a householder application <sup>1</sup> or shopfront proposal and you want to appeal, then you must do so **within 12 weeks** of the date of this notice. If this is a decision to refuse Advertisement Consent then you must submit your appeal **within 8 weeks** of the date of this notice. In all other cases if you want to appeal against your local planning authority's decision then you must do so **within 6 months** of the date of this notice.

If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate ([inquiryappeals@planninginspectorate.gov.uk](mailto:inquiryappeals@planninginspectorate.gov.uk)) at least 10 days before submitting the appeal. Further details are on GOV.UK.

Appeals must be made using a form, which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN. Alternatively, your appeal can be submitted electronically using the Planning Portal at [www.gov.uk/appeal-planning-inspectorate](http://www.gov.uk/appeal-planning-inspectorate).

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances that excuse the delay in giving notice of appeal. The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the proposed development or could not have granted it without the conditions imposed, having regard to the statutory requirements, to the provisions of a Development Order or to directions given under it. In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

### How to get our advice

It is well worth contacting the officer who dealt with your application to see if an alternative solution can be reached which would avoid the need for an appeal. Should you require our written advice prior to submitting a new application please be aware that there is normally a fee for such requests. Details of how to obtain our advice prior to submitting an application can be found on our website.

### Access to further information

Further guidance on Planning and Building regulation information and services can be accessed on our website and on the Planning Portal at [www.planningportal.co.uk](http://www.planningportal.co.uk).

We strongly encourage the submission of planning applications via the Planning Portal. We also provide an online planning service on our website that allows you to monitor and review all applications we receive. This can help you keep you up-to-date with planning matters in your area.

**This publication is available in large print, Braille or audio formats on request. Help is also available for people who require council information in languages other than English. Please contact us using our [www.n-somerset.gov.uk/contactplanning](http://www.n-somerset.gov.uk/contactplanning)**

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<sup>1</sup> Householder developments are defined as those within the curtilage of a house and are not a change of use or the creation of an additional dwelling or flat. Included in householder developments are extensions, conservatories, loft conversions, dormer windows, alterations, garages, car ports or outbuildings, swimming pools, walls, fences, domestic vehicular accesses including footway crossovers, porches and satellite dishes.



**Parish Councils Airport Association (PCAA) comment on application 20/P/2712/EA1 request for a formal screening opinion as to whether an Environmental Impact Assessment is required to be submitted for a proposed public transport interchange facility, associated internal vehicular access, relocated drop-off zone, taxi rank, new substation and new pedestrian routes and the consultation under 20/P/2711/AIN**

The PCAA is of the opinion that an Environmental Impact Assessment is required and that an application under s73 should be submitted for the relocation of the Public Transport Interchange (PTI) and ancillary developments to amend the 2011 planning permission.

**The Correct Consenting Process**

The Airport's request is being made under the planning consent of 2011 and not that of application 18/P/2018/OUT for growth to 12 mppa as this planning application was refused by NSC on 19 March 2020. Therefore, any agreement made by NSC officers under application 18/P/5118/OUT is currently irrelevant until the Bristol Airport Appeal is heard in 2021.

The movement of the PTI from the top of MSCP2 is an amendment to the current planning permission granted in 2011 (the 2011 Permission). Whilst the BA enjoys permitted development rights, under the 2011 Permission, condition 70 requires the development to be built in accordance with the relevant plans. These plans show the PTI on top of MSCP2 and so they will need to be amended. To legitimately build out the PTI as proposed in 20/P/2711/AIN an application under s73 would have to be made.

BA are seeking to evade proper scrutiny or control of what is effectively a large change to the way the 2011 Permission is to be delivered. It, therefore, needs to be applied for properly, and through the proper consenting process which is under s73 application to amend the existing planning permission and NSC can decide whether conditions need to be applied.

The starting point for an amendment to a scheme that was subject to EIA is that EIA will be required for the amendment.

**Need for EIA**

The Environmental Impact Assessment Screening Report recognises that the PTI is conditioned under growth to 10 mppa, under the planning consent of 2011. The location of the PTI was to be on top of the MSCP 2, thus these two developments are connected and the delivery of these developments should occur at the same time. The Condition helps to ensure the delivery of the MSCP 2.

Paragraph 2.3.18 of the Screening Report states 'There will be a temporary loss of short and long stay car parking as a result of the relocated DOZ until further car parking provision is provided by the construction of MSCP 2'. The report fails to state the number of short and long stay car parking places lost or when the construction of MSCP 2 will take place.

Paragraph 3.3.5 of the report states ‘the proposed development does, however, constitute a change to a Schedule 2 paragraph 10(e) project that has been authorised (i.e. the 10 mppa development) as the PTI will be located in the existing DOZ rather than on the top storey of MSCP 2. In consequence, it is appropriate to consider the proposed development in the context of the thresholds identified in paragraph 13b whereby EIA may be required if:

i. the development as changed or extended may have significant adverse effects on the environment;’

The temporary loss of car parking space will inevitably result in more car parking on the South side and also increase off-site car parking and on the rural road sides of parishes surrounding the Airport. The report fails to address the impacts of the loss of car parking spaces which is important because these give rise to many environmental impacts.

The report titled ‘Parking Demand Study Addendum’ for development to 12 mppa concludes that ‘Furthermore, in order to fully meet all the expected demand which is currently catered for by offsite capacity, it will be necessary to make both C1 and C2 all year round from 2020 onwards, once C2 has been constructed.’ Note that the scenario given is without MSCP 2 and no delivery date is mentioned within application 18/P/5118/OUT.<sup>1</sup>

Under the 10 mppa growth planning consent the Airport will have to submit a full application for use of the Silver Zone Phase 1 (Cogloop Land) for winter 2021, if the Appeal is unsuccessful.

The PCAA are unable to predict when passenger numbers will reach the level of 2019 which was approximately 9 mppa. But with the announcement that Jet2 is to be based at Bristol Airport with 56 weekly flights commencing from April 2021<sup>2</sup> and Ryanair expecting to increase passengers to normal levels<sup>3</sup>, there may be significant car parking environmental impacts which need examining.

The PCAA notes that the proposed development is 11 hectares in area comprising the new PTI, the internal access roads required for entry and exit, the area for temporary relocation of the DOZ and the site of the new pedestrian underpass. It is also difficult to see how a development over 11 hectares would not, at the very least, give rise to some short term significant effects in its construction. Landscape and visual effects need to be considered and the effects on the ANOB even in the short term.

The screening report underplays the effects with very little actual assessment or evidence. The 2011 Permission was an EIA development and a large infrastructure change is likely to have in combination effects on the project as a whole. It is likely that there will be significant effects rising from this just because of the nature of the project. Until an assessment is carried out it will be very difficult to ascertain what these will be. As with all EIA the precautionary principle should be applied and a full assessment required. BA cannot be left to dismiss the effects without actually carrying out a proper assessment.

Under this part of the criteria EIA is required.

Page 14 of the Screening Report (Table 3.1) shows the thresholds and criteria applying to paragraph 10 (e) of Schedule 2: Construction of airfields (unless included in Schedule 1) relevant to the Screening Opinion. The Screening Report only addresses the first criterion:

‘(i) The development involves an extension to a runway;’

The Screening Report does not consider the second criterion which needs to be considered separately:

‘(ii) the area of the works exceeds 1 ha’

Paragraph 3.3.5 of the screening report is incorrect and does not grapple with this requirement. The development is 11 hectares. It is therefore necessary to consider whether the development is likely to give rise to significant adverse environmental effects “by virtue of factors such as the development’s nature, size or location”.

An EIA and a full planning application is required.

#### Reference

1. [https://planning.n-somerset.gov.uk/online-applications/files/06582FF4D35115887DAE2A9440D1DC42/pdf/18\\_P\\_5118\\_OUT-SECTION\\_2\\_-\\_CAR\\_PARKING\\_-\\_FURTHER\\_INFORMATION\\_PURSUANT\\_TO\\_REGULATION\\_25-2860171.pdf](https://planning.n-somerset.gov.uk/online-applications/files/06582FF4D35115887DAE2A9440D1DC42/pdf/18_P_5118_OUT-SECTION_2_-_CAR_PARKING_-_FURTHER_INFORMATION_PURSUANT_TO_REGULATION_25-2860171.pdf)
2. <https://www.travelweekly.co.uk/articles/392310/jet2-announces-bristol-as-tenth-airport-base>
3. <https://theclassyinvestor.com/2020/11/11/ryanair-expects-air-passenger-numbers-to-bounce-back-in-2021/>

## Appendix D – Jet2 Destinations

# Jet2.com and Jet2holidays flies into its tenth UK base – Bristol Airport

Created: 11th Nov 2020

Award-winning airline and tour operator demonstrates continued confidence in its successful business by announcing its tenth UK base

*Jet2.com* and *Jet2holidays* has today marked another milestone in its continued success story, by announcing the **launch of flights and holidays from Bristol Airport**, which will become the **company's tenth UK base**.

The leading leisure airline and package holiday specialist has put an exciting 33 destinations on sale from Bristol Airport today. This includes a fantastic **Summer 21** programme, with local holidaymakers able to choose from 29 summer hotspots – including **FOUR NEW AND EXCLUSIVE** destinations from Bristol Airport (**Izmir** in Turkey; **Kalamata** and **Lesvos** in Greece; and **Costa de Almeria** in Mainland Spain). With 11 destinations also on sale for **Winter 21/22**, holidaymakers in the region are offered superb choice and flexibility when it comes to reaching the best sun and ski destinations across Europe, the Canary Islands and the Mediterranean. In its first summer of operations from Bristol Airport, *Jet2.com* and *Jet2holidays* will operate up to 56 weekly flights. A fleet of three based aircraft will fly customers to a wide choice of destinations across **Mainland Spain**, the **Canary Islands**, the **Balearic Islands**, **Greece**, **Turkey**, **Italy**, **Portugal** and **Madeira** (full list of destinations below). This is a huge programme for the company's first summer of operations from Bristol Airport, representing 450,000 seats on sale. *Jet2.com* and *Jet2holidays* will wave off its first flights from Bristol Airport on 1<sup>st</sup> April, with its inaugural flight departing to Lanzarote.

Customers can book direct or through an independent travel agent, with the company's award-winning trade team working in partnership with independent travel agents to given them all the knowledge they need to sell *Jet2holidays* package holidays and grow their businesses.

As well as booking and travelling on award-winning flights and ATOL protected package holidays from Bristol Airport, customers can now get to experience and enjoy the company's VIP customer service which has seen *Jet2.com* and *Jet2holidays* grow its business and repeatedly win high-profile accolades such as **Which? Recommended Provider** and **TripAdvisor's Best Airline – UK and Top 10 Airlines of the World**.

This VIP customer service includes friendly flight times and a generous 22kg baggage allowance through a flight-only booking with *Jet2.com*, which saw the airline win five accolades at the 2020 TripAdvisor Travellers' Choice® Awards for Airlines; or that very same VIP customer service, in-resort Customer Helpers, transfers, free child places and ATOL protection with the UK's second largest tour operator, *Jet2holidays*.

The company has continued this customer-first strategy throughout the Coronavirus pandemic, winning praise from customers, consumer organisations, media, and independent travel agents for how it has looked after customers affected by programme changes. This includes *Jet2.com* and *Jet2holidays* ranking as the number one and two travel firms for providing refunds, according to a travel refund cancellation survey of more than 77,000 people by MoneySavingExpert.com (MSE). In addition, *Jet2.com* was recognised as the only UK airline to promptly provide refunds without significant backlogs, following a review by the UK Civil Aviation Authority (CAA).

In addition to that, customers know they are well looked after when travelling with *Jet2.com* and *Jet2holidays* thanks to a programme called '**Your safety, our priority**' which has resulted in overwhelmingly positive satisfaction scores from customers when it comes to

their experiences on holiday this summer. From HEPA filters on aircraft, onboard cleaning and ensuring that everyone wears face masks throughout the flight through to in-resort care, safe transfer journeys and ensuring everything is in place for a healthy and happy holiday, the company's full pledge to get customers back on holiday can be found at: <https://www.jet2holidays.com/safe-travel> and <https://www.jet2.com/flights/safe-travel>. Today's announcement demonstrates *Jet2.com* and *Jet2holidays*' continued confidence in its product and proposition, and further underlines the company's long-term ambition to become the leading UK leisure travel business.

*Jet2.com* and *Jet2holidays*' arrival at Bristol Airport means significant investment for the region. More than 200 NEW JOBS will be created with roles including flight and cabin crew, engineers and ground operations staff. To find out about joining the award-winning team, interested candidates can visit: <https://www.jet2careers.com/>

**Steve Heapy, CEO of Jet2.com and Jet2holidays said:** "This is an incredibly exciting day for *Jet2.com* and *Jet2holidays*, as we expand our award-winning flights and holidays to Bristol Airport. We know how much demand there is, because we have been listening to customers and independent travel agents in the region for some time. We are delighted to be bringing them the news that they have been looking forward to, meaning that they can finally enjoy real package holidays from Bristol Airport."

"The announcement of our tenth UK base reflects our long-term strategy to continue growing our successful business and become the UK's leading leisure travel business. It also represents a significant investment in the region, including the creation of at least 200 new jobs. As well as this huge economic contribution, this announcement means holidaymakers can look forward to something they have not experienced before from Bristol Airport, which is our award-winning customer service. When it comes to booking and travelling with *Jet2.com* and *Jet2holidays*, we know that customers will not only love the 33 fantastic destinations that we have on sale, but once they experience our service, they will quickly understand why organisations such as Which? and Trip Advisor repeatedly praise and award us for the way we treat and look after our customers. We cannot wait to launch operations, and we look forward to taking holidaymakers from Bristol Airport on a package holiday they can trust.

**Dave Lees, CEO, Bristol Airport said:** "We are delighted to welcome *Jet2.com* and *Jet2holidays* to Bristol Airport. Never has the time been more important for the region to look to the future in a post-Covid world, and *Jet2.com* and *Jet2holidays* have shown the confidence in the strength of the region to open up their tenth UK operating base at Bristol Airport. This exciting news is a major step towards the future by creating job opportunities, providing significant investment and an increase in the choice of destinations and holidays available to customers in the region. We will continue to work closely with *Jet2.com* and *Jet2holidays* on the strategic partnership and develop further opportunities in the future."

#### **Jet2.com and Jet2holidays' Summer 21 Programme from Bristol Airport:** **Mainland Spain**

- **Costa de Almeria – NEW ROUTE FOR BRISTOL AIRPORT** with weekly Thursday services operating in Summer 21
- **Girona (Costa Brava)** – weekly Saturday services
- **Reus** – up to two weekly services (Monday and Thursday)

#### **Canary Islands**

- **Fuerteventura** – up to two weekly services (Tuesday and Saturday)
- **Gran Canaria** - up to two weekly services (Monday and Thursday)
- **Lanzarote** - two weekly services (Thursday and Sunday)
- **Tenerife** – up to three weekly services (Tuesday, Friday and Saturday)

#### **Balearic Islands**

- **Ibiza** – up to three weekly services (Tuesday, Thursday and Saturday)
- **Majorca** – up to five weekly services (Monday, Wednesday, Friday, Saturday and Sunday)

- **Menorca** – up to three weekly services (Tuesday, Friday and Saturday)
- Portugal**
- **Faro** – up to four weekly services (Monday, Tuesday, Friday and Saturday)
- **Madeira** – weekly Monday services
- Italy**
- **Naples** – weekly Sunday services
- **Verona** - weekly Saturday services
- Greece – 12 Greek destinations on sale including:**
- **Corfu** – up to two weekly services (Wednesday and Sunday)
- **Crete (Heraklion)** - up to two weekly services (Tuesday and Friday)
- **Halkidiki** – weekly Thursday services
- **Kalamata** – **NEW ROUTE FOR BRISTOL AIRPORT** with weekly Wednesday services
- **Kefalonia** – weekly Sunday services
- **Kos** – weekly Thursday services
- **Lesvos** - **NEW ROUTE FOR BRISTOL AIRPORT** with weekly Sunday services
- **Preveza** - weekly Sunday services
- **Rhodes** – up to two weekly services (Tuesday and Saturday)
- **Santorini** – weekly Wednesday services
- **Skiathos** – up to two weekly services (Wednesday and Sunday)
- **Zante** - up to two weekly services (Monday and Friday)
- Turkey**
- **Antalya** – three weekly services (Monday, Wednesday and Friday)
- **Dalaman** – up to four weekly services (Monday, Tuesday, Thursday and Friday)
- **Izmir** - **NEW ROUTE FOR BRISTOL AIRPORT** with weekly Tuesday services operating
- Jet2.com and Jet2holidays' Winter 21/22 Programme from Bristol Airport:**
- Canary Islands**
- **Fuerteventura** – two weekly services (Wednesday and Saturday)
- **Gran Canaria** - two weekly services (Monday and Thursday)
- **Lanzarote** - three weekly services (Tuesday, Thursday and Sunday)
- **Tenerife** – four weekly services (Tuesday, Friday, Saturday and Sunday)
- Portugal**
- **Faro** – two weekly services (Monday and Friday)
- **Madeira** – weekly Monday services
- Cyprus**
- **Paphos** – weekly Sunday services
- Turkey**
- **Antalya** – two weekly services (Tuesday and Friday)
- Ski services**
- **Geneva** – weekly Saturday services
- **Grenoble** - weekly Sunday services
- **Salzburg** – weekly Saturday services