Bristol Airport Appeal Proof of Evidence – Dr Steve Melia

About Me

I am a Senior Lecturer in Transport and Planning at the University of the West of England. I have advised government departments, local authorities and was one of the expert speakers at the UK Climate Assembly in February 2020. I have helped the objectors in the past but I have not been involved in preparations for this appeal, so I am speaking in a personal capacity.

My evidence concerns two main points:

1) Surface access and modal share
2) The Sixth Carbon Budget, the Transport Decarbonisation Plan and their implications for this appeal

1 Surface Access and Modal Share

The applicant writes of a "stretching" modal share target of 17.5%,[1] in other words, 82.5% by car or taxi compared to a current situation of 87%.

That target is only "stretching" in the sense that they might not meet it. The public transport improvements proposed in the Transport Assessment are largely aspirational; few of the measures are under the direct control of the applicant.[2] Public transport of all kinds is currently facing great uncertainty due to COVID-19 and enduring public concerns about social mixing.

The applicant's confidence that their proposed measures will increase modal share by 4.5 percentage points is not supported by recent evidence. Previous improvements to the airport bus services in 2017-18 were much bigger and more expensive than the proposals contained in this application, but their impact on modal share was very limited – see Appendix 1.

Bristol is the only airport in the UK of its size or larger with no rail or tram connection – see Appendix 2. Bristol City Council has a long-term aspiration to build an underground metro system, but no funding has been secured for that and their Transport Strategy refers to a planning horizon of "about 20 years".[3]

The applicant's own Comparison of Modal Shares Figure 4.1[4] shows how Bristol Airport's modal share for access by car is higher than any of its competitors.

Strategic Priority 1 in the government's *Transport Decarbonisation Plan* is: "accelerating modal shift toward public transport and active travel".[5] They state an objective to "reduce urban traffic overall."[6] This expansion would move us in the opposite direction.

2 The Sixth Carbon Budget, Decarbonisation Plan and Implications for this Appeal

The Sixth Carbon Budget is now law.[7] It requires the UK to cut its carbon emissions by 63% between 2019 and 2033-2037 (if the budget is equally divided between those years). This budget now includes international aviation and shipping. It is an absolute legal requirement. Unlike most other factors weighed in planning inquiries, it cannot be "balanced" against other factors, such as alleged economic benefits.

The Committee on Climate Change have proposed a Balanced Pathway for aviation to comply with those budgets. This shows that this will require considerable restraint on demand and/or supply, including "no net expansion of UK airports."[8]

The government is required to respond to the recommendations of the Committee, which they have recently done with a *Decarbonisation Plan*, *Jet Zero Consultation* and supporting documents.

Unfortunately, none of these documents provide clarity on what steps the UK will need to take at a national or local level to reach the legal carbon budgets. However, they do contain a clear implication for this appeal.

The *Jet Zero Consultation* says: "We recognise that net zero 2050 must be achieved and we must ensure that any growth in aviation is compatible with our emissions reduction commitments."[9]

It sets an emissions reduction trajectory based on their 'High Ambition Scenario', which is similar to the Balanced Pathway proposed by the Climate Change Committee. However, unlike the Committee, the government believes this can be achieved "without the Government needing to intervene directly to limit aviation growth."[10]

This belief is based on the scenarios in an accompanying Evidence and Analysis report.[11] The assumptions in the High Ambition scenario are described as "optimistic." For example, it shows fuel efficiency increasing at 2% pa, compared to 1.4% pa assumed by the Committee on Climate Change in their Balanced Pathway. The latter already assumes an active policy to promote greater efficiency; they contrast it with a "baseline" (business as usual) pathway of 0.7% pa improvement.[8]

The diagram illustrating the High Ambition Scenario shows the only demand management measure, carbon pricing, making only a small contribution to moderating the increase in demand.[12]

The government says: "there are scenarios that ***can*** achieve similar or greater CO_2 reductions to those in the CCC's Balanced Pathway…by focussing on new fuels and technology"[13] [emphasis added]. However, they present no evidence to show that those "optimistic" scenarios are ***likely*** to happen – because no such evidence exists. Their preferred scenario should be viewed as an aspiration, motivated by (laudable) industrial development aims and a (political) desire to defer difficult decisions.

A Technology Roadmap, commissioned as a semi-independent assessment, was published alongside the *Jet Zero Consultation*.[14] The *Decarbonisation Plan* includes a graphic illustration of its main conclusions.[15] This provides a realistic assessment of the likely impact of technological progress, which differs from the optimistic assumptions mentioned above. Note the "solutions certainty" column in the graphic illustration[15] and their conclusion that domestic aviation will not be able to fully decarbonise through technological change by 2050 (the government is consulting on an aim to do that 2040).

The *Jet Zero Consultation* states that: "as a responsible government, we will need to keep our Strategy under review." This can be viewed as a recognition of the uncertainty surrounding their optimistic aspirations, or as "kicking the can down road" to future governments, knowing that they will probably be forced to take further action to keep emissions within the legal limits.

2.1 What Is National Policy Now Saying About Local Applications to Expand Airports?

A footnote to the *Jet Zero Consultation* is particularly relevant to this appeal. It states that "expansion of any airport must meet its climate change obligations."[16] This footnote also refers to two documents published in 2018, *Airports National Policy Statement*[17] and *Making Best Use of Existing Runways.*[18] Significantly, neither the *Jet Zero Consultation* nor the *Decarbonisation Plan* mention the 2013 Aviation Policy Framework. Although that document was never formally withdrawn, it is now described on the government website as a policy of a previous government.[19] We may infer therefore, that it is now obsolete.

The *Airports National Policy Statement* mainly concerns airports in the Southeast. *Making Best Use* is more relevant to Bristol. Its analysis and main conclusions are clearly now out of date, but contrasting them with the *Jet Zero Consultation* can help to elucidate how local authorities should treat climate change when considering applications to expand regional airports.

The wording of *Making Best Use* is ambiguous (possibly deliberately so) but appears to draw a distinction between local and national environmental issues, with climate change in the latter category. It describes a "carbon capped scenario", which the government believed at that time would achieve the Climate Change Committee's pre-2019 target for aviation of 37.5 $MTCO_2$ by 2050. It appears to imply that local applications could assume that the target would be met by national policies[20] using trade-offs with deeper cuts in other sectors if necessary.[21] That option is clearly no longer available now the law requires net zero emissions by 2050.

By contrast the *Decarbonisation Plan* and the *Jet Zero Consultation* make no similar claims about the High Ambition Scenario (which is aiming for 21 $MTCO_2$ by 2050). The statement that "expansion of any airport must meet its climate change obligations" contradicts or supersedes the implication in *Making Best Use* that such matters would be dealt with at a national level (if that inference is correct).

The clear implication of the above is that **local authorities faced with applications to expand airports must form their own judgements about the climate change implications**

of each application. National policy is unclear and unhelpful, but has changed in two important respects:

- It now recognises the Sixth Carbon Budget as an absolute requirement, and:
- the earlier confidence of national governments that national measures would achieve the required reductions has been replaced by a more tentative "belief", which will be kept "under review."

2.2 North Somerset's Planning Policy and Implications for this Appeal

There is a legitimate element of local democracy in deciding planning applications, as well as planning policies. That is why councillors, rather than officers or government inspectors, are required to vote on the most important local applications. Providing councillors follow their own policies and do not violate national policies, it is not the role of planning inquiries to supplant that democratic element.

North Somerset's Core Strategy policy CS23 states that "Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues." The accompanying text explains that climate change is one of those issues. It also declares an expectation that that national governments would "place additional weight on climate change" in future amendments to national policy.

In the context of that policy, the Net Zero legislation and the continuing uncertainty over national policy (which has still not been resolved) the councillors decided that the proposed expansion of Bristol Airport was not compatible with UK's climate obligations. Over the course of this appeal you will hear much evidence to show that judgement, which they are entitled to make, was, and is, a very reasonable one.

In that respect, I will mention just one more relevant factor. The DfT's last national aviation forecasts were published in 2017. They contain several scenarios, including some which would have substantially exceeded the previous 37.5 $MTCO_2$ carbon target. None of them would have achieved the new 21 $MTCO_2$ target. All of those scenarios show Bristol Airport at 10 million passengers pa by 2050. The text explains that was a deliberate decision, not an oversight.[22]

For those and many other reasons, this appeal should be rejected.

Appendix 1 - Past History of Improvements to Bus Service to Bristol Airport

Substantial, expensive investments in bus service improvements between Bristol and Bristol Airport have only made a small difference to the modal shares of surface access. The applicant's previous Surface Access Strategy, published in 2012 estimated a modal share for public transport of 13%[23] - similar to the baseline in their application.[1]

Between 2014 and 2018 Bristol invested in one of its biggest transport projects, costing over £200m. The Metrobus project created a network of express buses running on partially segregated tracks. As part of that project a new road with bus priority measures, the South Bristol Link Road, was built at a budgeted cost of £44.5m.[24] That new road, along with the segregated Metrobus guideway enabled a significant improvement to the Airport Flyer services, starting from late in 2018.[25] The improvement was both in terms of journey time, but also reliability.

The Airport's monitoring report[26] claimed that the improved service increased modal share from 12.5% to 13.8% in 2019.*

The important point for this inquiry is that the 2017/18 improvements were far greater in cost and physical changes than BAL is proposing to support its current application.

* The modal share statistics provided by BAL and the CAA do not always appear to be measured or presented in a consistent way. I have used figures taken from BAL's reports for internal consistency.

Appendix 2 – UK Airports by Size and Public Transport Connectivity

	Flights/Year[27]	Directly Served By:	
	(M 2019)	Rail	Light Rail
Heathrow	80.9	Yes	Yes
Gatwick	46.6	Yes	No
Manchester	29.4	Yes	Yes
Stansted	28.1	Yes	No
Luton	18.2	Yes	No
Edinburgh	14.7	No	Yes
Birmingham	12.6	Yes	No
Bristol	9.0	No	No
Glasgow	8.8	Yes (1 mile)	No
Belfast	6.3	No	No
Newcastle	5.2	No	Yes
London City	5.1	No	Yes
Liverpool	5.0	No	No

References

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[4] CD 3.4.02 Peter Brett (2019) Applicant Additional Information on Transport
[5] DfT (2021) Transport Decarbonisation Plan. Page 36. On: https://www.gov.uk/government/publications/transport-decarbonisation-plan
[6] Ibid page 6 (Grant Shapp's introduction)
[7] Carbon Budget Order 2021 came into force June 24th: On: https://www.legislation.gov.uk/uksi/2021/750/contents/made
[8] Committee on Climate Change (2021) Sixth Carbon Budget. Page 176. On: https://www.theccc.org.uk/publication/sixth-carbon-budget/
[9] DfT (2021) Jet Zero: Our Strategy for Net Zero Aviation. Section 3.4.2. On: https://www.gov.uk/government/consultations/achieving-net-zero-aviation-by-2050
10 Ibid Section 3.4.1
[11] DfT (2021) Jet Zero Consultation: Evidence and Analysis. Sections 3.6 to 3.18. On: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002163/jet-zero-consultation-evidence-and-analysis.pdf
[12] Ibid 3.10
[13] Ibid Section 3.4.1
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[19] https://www.gov.uk/government/publications/aviation-policy-framework
[20] Beyond the Horizon 1.21
[21] Ibid 1.15
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[26] Bristol Airport Limited (2020) Annual Monitoring Report 2019. Section 14 – Public Transport. On: https://www.bristolairport.co.uk/~/media/files/brs/about-us/environment/annual-monitoring-report-2019.ashx?la=en

[27] Civil Aviation Authority (2021) Airport Data 2019. Table 1: Size of Airports https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/Airport-data-2019/