

Planning Balance Summary – Bristol Airport Limited

Introduction

Further to the request of the Inspectors, Bristol Airport Limited (BAL) has completed the planning balance summary table below.

Consistently with the approach adopted by North Somerset Council (NSC), under each subject area the relevant planning considerations have been identified and the weight applied in the planning balance is summarised. The scale adopted, which is the same as that used by NSC, is as follows:

- Limited if any weight
- Some Weight
- Moderate Weight
- Significant Weight
- Very Significant Weight

Where a factor does not weigh one way or the other in favour of either grant or refusal, it has been identified as having no or neutral weight.

The information presented in this document is not intended to substitute or depart from the evidence presented during the course of the Inquiry, or the closing submissions submitted on behalf of BAL. In the event of any apparent inconsistencies between the information set out below and BAL's evidence, the latter should be relied upon.

Summary Table

Issue	Impact / Significance	Weight
Climate Change	<p>The Appeal Proposal will have an overall adverse impact on carbon emissions which is not significant. The Appeal Proposal will not materially affect the ability of the Government to meet its ‘net zero’ carbon target for 2050.</p> <p>The Environmental Statement Addendum (ESA)¹, and the evidence presented by Dr Ösund-Ireland to the inquiry, has established that emissions arising from the Appeal Proposal will be very small in the context of either the planning assumption of 37.5 MtCO₂/annum or the Sixth Carbon Budget and ‘not significant’ in EIA terms.</p> <p>Assessing the significance of these emissions must take into account the legal and policy framework in place. The Secretary of State is under a legal duty to ensure that the carbon budgets, and the net zero target, are met. <u>How these targets are met is a matter for Government.</u> There are a number of legal and policy mechanisms available to the Government to ensure that its targets and budgets are achieved. These include, in particular, the UK Emissions Trading Scheme (ETS) (under which aviation emissions are capped) and the UN’s CORSIA system. The Government retains the ability to introduce further measures, if it needs to, in order to meet its climate change obligations.</p> <p>Making Best Use (MBU)² confirms that the carbon emissions from aviation is a matter for <u>national</u> policy. MBU remains extant and the introduction of the net zero target in 2019 into the Climate Change Act 2008 has not changed this position, nor has the inclusion of emissions from international aviation and shipping within the Sixth Carbon Budget. Importantly, this conclusion is the same</p>	<p>Limited weight against the grant of planning permission.</p> <p>This judgement takes into account the conclusion of the ESA that the carbon emissions associated with the Appeal Proposal are not significant and will not materially affect the ability of the UK Government to meet its climate change targets. It also takes into account the measures proposed by BAL to facilitate the transition of the airport to net zero by 2030.</p>

¹ CD 2.19 to CD 2.20.6: Wood (2020) Development of Bristol Airport to Accommodate 12 Million Passengers Per Annum Environmental Statement Addendum (November 2020).

² CD 6.4: HM Government (2018) Beyond the Horizon – The Future of UK Aviation: Making Best Use of Existing Runways.

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	<p>as that reached by Inspectors in their decision on the Stansted Airport appeal³ which has now been confirmed in the High Court (CO/2356/2021).</p> <p>BAL has published its draft Carbon and Climate Change Action Plan (CCCAP)⁴ which sets out how it will manage the carbon impacts of increasing the capacity of Bristol Airport to accommodate 12 million passengers per annum (mppa) and facilitate the transition of the airport to net zero by 2030. This is in accordance with Development Plan Policy CS1 and paragraph 152 of the National Planning Policy Framework (NPPF)⁵.</p>	
Noise	<p>The Appeal Proposal will have an overall adverse impact on noise which is not significant.</p> <p>The ESA demonstrates that the Appeal Proposal will not result in significant adverse air or ground noise impacts. Whilst the number of properties predicted to experience average night-time air noise levels above the Significant Observed Adverse Effect Level (SOAEL) will increase, the ESA confirms that changes in noise levels will be small and not significant.</p> <p>A comprehensive range of measures are proposed by BAL to mitigate the noise impacts of the Appeal Proposal and share the benefits of aviation growth (which is a general principle advanced in the Aviation Policy Framework (APF)⁶. Supported by a revised Noise Control Scheme and building on existing controls, these measures include:</p> <ul style="list-style-type: none"> • a reduction in the 57 dB L_{Aeq,16h} daytime air noise contour area limit from its current value of 12.42 km² to 10.70 km² at 12mppa; 	<p>Limited weight against the refusal of planning permission.</p> <p>This judgement takes into account the conclusions of the ES and ESA which establish that the adverse air and ground noise impacts associated with the Appeal Proposal will not be significant. In turn, the judgement also reflects the noise mitigation measures proposed by BAL and the noise benefits that will be delivered as a result of the Appeal Proposal.</p>

³ CD 6.13: The Planning Inspectorate (2021) Appeal Decision in Respect of London Stansted Airport, Essex by Michael Boniface MSc MRTPI, G D Jones BSc(Hons) DipTP MRTPI and Nick Palmer BA (Hons) BPI MRTPI (reference APP/C1570/W/20/3256619) – 26 May 2021.

⁴ CD 9.48: Wood (2021) Bristol Airport Ltd Draft Carbon and Climate Change Action Plan (CCCAP).

⁵ CD 5.8.1: Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework.

⁶ CD 6.1: HM Government (2013) The Aviation Policy Framework (March 2013).

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	<ul style="list-style-type: none"> • a reduction in the number of night flights allowed during the ‘shoulder periods’ (23.00 to 23.30 and 06.00 to 07.00 hours) from 10,500 flights to 9,500 flights; • a new night noise contour limit whereby from 2030, the area enclosed by the 55dB $L_{Aeq,8hr}$ night-time noise contour shall not exceed 6.8km²; • acceptance of a new 1 dB Quota Count (QC) banding night control scheme with the retention of the seasonal budgets as per today; • the phasing out of a QC 10% borrow and/or carry over as previously agreed with NSC; and • the banning of QC2 and above rated aircraft for the period 23.30 to 06.00. <p>BAL also proposes an enhanced noise insulation scheme including a substantial increase in the value of grants available to residents and the inclusion of properties within the 55 dB $L_{Aeq,8h}$ air noise contour area which exceeds the minimum policy requirement set out in paragraph 3.39 of the APF of 63 dB $L_{Aeq,16h}$ as well as the recommendations contained in Aviation 2050⁷.</p> <p>For some receptors, the Appeal Proposal will provide a benefit in terms of ground noise due to additional screening.</p> <p>Overall, the Appeal Proposal is in accordance with Policy CS3 and Policy CS23 of the Development Plan.</p> <p>By delivering improvements in noise and controlling and mitigating adverse impacts, the Appeal Proposal also accords paragraph 185 of the NPPF, the Noise Policy Statement for England⁸ and national aviation policy.</p>	

⁷ CD 6.5: HM Government (2018) Aviation Strategy 2050: The Future of UK Aviation (December 2018).

⁸ CD 10.4: Defra (2010) Noise Policy Statement for England (March 2010).

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Air Quality	<p>The Appeal Proposal will have an overall adverse impact on air quality which is not significant.</p> <p>The ESA has established that the adverse air quality impacts of the Appeal Proposal will not be significant, that all concentrations of pollutants will remain comfortably within the Air Quality Objective (AQO) limits and that current compliance with all relevant limit values and objectives will be sustained.</p> <p>A range of measures will be implemented to mitigate the air quality impacts associated with the Appeal Proposal which is in addition to, and alongside, wider measures being taken by the aviation industry to reduce emissions from aircraft.</p> <p>Development Plan Policy CS3 requires that the air quality impacts of proposals are mitigated to an acceptable level; Policy CS23 sets out that environmental issues associated with development proposals at Bristol Airport should be satisfactorily resolved. The NPPF (paragraph 186) requires proposals to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants. These tests are satisfied.</p> <p>There is no policy requirement for the Appeal Proposal to deliver an overall improvement in terms of air quality.</p>	<p>Limited weight against the grant of planning permission.</p> <p>This judgement takes into account the findings of the ESA which confirm that the Appeal Proposal will not result in significant adverse air quality impacts.</p>
Health	<p>The Appeal Proposal will have an overall beneficial impact on human health which is not significant.</p> <p>BAL has undertaken a Health Impact Assessment pursuant to Policy CS26 of the Development Plan; this was presented in the ES and was subsequently updated in the ESA. The assessment has confirmed that the Appeal Proposal will not cause significant adverse health impacts; adverse health impacts will be minor and localised.</p>	<p>Limited weight in favour of the grant of planning permission.</p> <p>This judgement takes into account the localised, adverse health impacts of the Appeal Proposal which the ESA has confirmed will not be significant. It also takes into account the substantial health benefits of the Appeal</p>

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	<p>There is no express policy requirement for development proposals to deliver a health improvement. Notwithstanding this, the health assessment has identified that the Appeal Proposal will deliver significant health benefits including the creation of jobs. Mr Pyper concludes in his Rebuttal Proof of Evidence⁹ (paragraph 2.1.63) that <i>“On balance the Appeal Proposal is likely to contribute to improving the health and well-being of the local population more than it detracts from it”</i>.</p>	<p>Proposal and, in-turn, the measures proposed by BAL to deliver health improvements.</p>
Surface Access	<p>The Appeal Proposal will have an overall adverse impact on surface access which is not significant.</p> <p>The Transport Assessment Addendum (TAA)¹⁰ confirms that the additional traffic generated by the Appeal Proposal will not prejudice highway safety or result in severe cumulative impacts on traffic congestion. This is in accordance with the test set out in Policy DM24 of the Development Plan and paragraph 111 of the NPPF. To mitigate further the impacts of the Appeal Proposal, and deliver additional enhancements where possible, the proposed planning obligations and conditions contain additional highways commitments.</p> <p>The TAA demonstrates that the proposed A38 highway improvement scheme will deliver significant local capacity benefits and enhance safety which the ESA concludes as generating a major beneficial effect in respect of driver delay. The Appeal Proposal has therefore made adequate provision in terms of highways capacity which is in accordance with Policy CS23 and also Policy DM50 of the Development Plan.</p> <p>Bristol Airport has the highest passenger public transport mode share of any regional airport cited in 2019 Civil Aviation Authority (CAA) data¹¹. BAL has</p>	<p>Limited or no weight against the grant of planning permission.</p> <p>This judgement takes into account the evidence presented in the TAA and ESA which confirms that, with mitigation including the proposed A38 highway improvements, the Appeal Proposal will not prejudice highway safety or result in severe cumulative impacts on traffic congestion. It also reflects the substantial package of measures proposed by BAL to deliver a 2.5% increase in public transport mode share.</p>

⁹ BAL8/3.

¹⁰ CD2.20.3: Stantec (2020) Development of Bristol Airport to Accommodate 12 Million Passengers Per Annum: Transport Assessment Addendum (TAA) (November 2020).

¹¹ CD 7.10.

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	<p>committed to a 2.5% increase in public transport mode share; the evidence of Mr Witchalls has confirmed that this is a stretching and ambitious target aligned with BAL's parking solution. This target will be delivered through a comprehensive package of deliverable, sustainable transport measures. On this basis, the Appeal Proposal is in accordance with Development Plan Policies CS1, CS10 and Policy CS11 as well as paragraph 105 of the NPPF and national aviation policy; it is also consistent with the Joint Local Transport Plan 4¹². The second test set out in Policy DM24 (that proposals will only be refused where they are not accessible by non-car modes or cannot readily be integrated with public transport) does not apply.</p>	
Green Belt	<p>The Appeal Proposal will have an overall adverse impact on Green Belt which is not significant.</p> <p>The Green Belt Assessment presented at Appendix A to Mr Melling's Proof of Evidence¹³ has confirmed that the Appeal Proposal will result in only limited harm to the Green Belt. The following very special circumstances outweigh any harm to the Green Belt:</p> <ul style="list-style-type: none"> the need for additional car parking in the Green Belt to meet demand associated with an additional 2 mppa; the lack of alternative, available and suitable sites for parking outside the Green Belt; and the need for, and benefits of, the growth of Bristol Airport. 	<p>Limited weight against the grant of planning permission.</p> <p>The weight applied to Green Belt harm is derived from the application of paragraph 148 of the NPPF, which states that substantial weight should be given to any harm to the Green Belt, and the minor/limited harm to the Green Belt arising from the Appeal Proposal as identified in the Green Belt Assessment.</p> <p>Any harm to the Green Belt, and any other harm resulting from the Appeal Proposal, is outweighed by the 'very special circumstances' outlined opposite. In that context, limited weight has been applied against the grant of planning permission.</p>

¹² CD 7.5: Travelwest (2020) Joint Local Transport Plan 4 2020-2036 (March 2020).

¹³ BAL/7/2.

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	<p>BAL is proposing a monitor and manage approach to the delivery of the further extension to the Silver Zone Car Park (alongside Multi-storey Car Park 3). This will mean that the development of car parking in the Green Belt, and the associated harm this causes, will only occur when there is sufficient demand for additional spaces.</p> <p>Overall, the Appeal Proposal is in accordance with Policy DM12, as well as Policy DM50, of the Development Plan.</p>	
Landscape and Visual. Ecology, Land Quality, Surface Water and Flood Risk, Groundwater and Historic Environment	No significant benefits or residual adverse impacts (agreed position).	Neutral weight (agreed position).
Benefits	<p>The Appeal Proposal will deliver significant economic and social benefits as well as environmental enhancements.</p> <p>There is a compelling need for the Appeal Proposal. It will:</p> <ul style="list-style-type: none"> • accommodate agreed forecast passenger demand in order to meet the Government's national aviation policy of making best use and wider economic objectives and clawback the historic leakage of passengers from London's airports; • deliver substantial social and economic benefits, supporting national, regional and sub-regional economic growth, recovery from the COVID-19 pandemic and the Government's levelling-up agenda. This aligns with the 	<p>Very significant weight in favour of the grant of planning permission.</p> <p>This judgement is consistent with paragraph 81 of the NPPF which establishes that significant weight should be placed on the need to support economic growth and productivity. It takes into account the findings of the Economic Impact Assessment Addendum¹⁶ and the ESA which establish that the social and economic benefits of the Appeal Proposal will be significant.</p>

¹⁶ CD 2.22: YAL (2020) Development of Bristol Airport to Accommodate 12 Million Passengers Per Annum: Economic Impact Assessment Addendum (November 2020).

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	<p>West of England Industrial Strategy¹⁴ and the North Somerset Economic Plan¹⁵ and will be supported by a Skills and Employment Plan to ensure that the most deprived communities benefit from development;</p> <ul style="list-style-type: none"> • help meet the UK's global ambitions for increased international connectivity and trade following the UK's departure from the EU; • ensure adverse impacts on the environment and local communities are minimised and securing, where possible, enhancements. <p>Conversely, constraining the capacity of Bristol Airport would result in:</p> <ul style="list-style-type: none"> • passengers either not making trips at all or gravitating towards airports outside the South West region and South Wales; • the significant economic benefits of expansion not being realised; • the existing benefits Bristol Airport being diminished. 	<p>It also takes into account the need for the Appeal Proposal in terms of accommodating forecast passenger demand, which is in accordance with national aviation policy, and the environmental benefits that will be secured as part of the development.</p>
APF and MBU	<p>The Appeal Proposal is in accordance with national aviation policy set out in the APF and MBU.</p> <p>National aviation policy establishes the Government's in principal support for regional airports making best use of their existing runways. This policy remains extant notwithstanding the introduction of the net zero target into the Climate Change Act 2008¹⁷ and the Sixth Carbon Budget. It must, therefore, be afforded full weight. Indeed, the policy is inextricably linked to, and underpins, the UK Government's wider economic priorities and objectives which must also be afforded full and substantial weight.</p> <p>The Appeal Proposal will accommodate forecast passenger demand and in accordance with national aviation policy, this demand should be met, subject to</p>	<p>Very significant weight in favour of the grant of planning permission.</p> <p>This judgement reflects BAL's case that the Appeal Proposal directly responds to, and is in accordance with, the Government's aviation policy. The benefits the Appeal Proposal will deliver can be achieved whilst ensuring that adverse impacts on the environment and local communities are appropriately minimised and mitigated.</p>

¹⁴ CD 11.7: HM Government (2019) The West of England Local Industrial Strategy (July 2019).

¹⁵ CD 11.15: NSC (2020) North Somerset Economic Plan 2020-2025 (September 2020).

¹⁷ CD 9.7: Climate Change Act 2008 (2050 Target Amendment) Order 2019.

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	the balanced consideration of adverse impacts. The evidence presented by BAL to the Inquiry has clearly established that the adverse impacts of the Appeal Proposal are not significant whilst the benefits of increasing the capacity of Bristol Airport are substantial.	
National Planning Policy Framework	<p>The Appeal Proposal is in accordance with the NPPF.</p> <p>The Appeal Proposal supports the Government’s economic, social and environmental objectives and is sustainable development. The benefits the Appeal Proposal will deliver can be achieved whilst ensuring that adverse impacts on the environment and local communities are appropriately minimised and mitigated.</p>	<p>Very significant weight in favour of the grant of planning permission.</p> <p>In accordance with the presumption in favour of sustainable development established at paragraph 11 of the NPPF, the Appeal Proposal should be granted planning permission.</p>
Development Plan	<p>The Appeal Proposal is in accordance with the Development Plan.</p> <p>All of the matters raised in NSC’s reasons for refusal have been satisfactorily addressed and the Appeal Proposal is in accordance with the Development Plan.</p>	<p>Very significant weight in favour of the grant of planning permission.</p> <p>This judgement takes into account BAL’s case that the Appeal Proposal is in accordance with the Development Plan and the presumption in favour of sustainable development contained in the NPPF.</p>