

STATEMENT OF COMMON GROUND

PART 2: DETAILED MATTERS

LOCAL PLANNING AUTHORITY REFERENCE: 18/P/5118/OUT

APPEAL REFERENCE: APP/D0121/W/20/3259234

SECTION 78 OF THE TOWN AND COUNTRY PLANNING ACT 1990

**APPEAL AGAINST THE DECISION OF NORTH SOMERSET COUNCIL TO REFUSE
PLANNING PERMISSION FOR THE PROPOSED DEVELOPMENT AT BRISTOL
AIRPORT, NORTH SIDE ROAD, FELTON, WRINGTON, BS48 3DP**

APPELLANT: BRISTOL AIRPORT LIMITED

LOCAL PLANNING AUTHORITY: NORTH SOMERSET COUNCIL

DATED 8th October 2021

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I. INTRODUCTION

1. This is Part 2 of the Statement of Common Ground (“**SOCG**”) and deals with the detailed matters for the appeal. It should be read in conjunction with Part 1: General Matters.
2. This part of the SOCG includes matters of agreement and disagreement relevant to North Somerset Council's (NSC) reasons for refusal. It is presented in a table format focusing on the following topics:
 - I. Air Quality
 - II. Climate Change
 - III. Surface Access
 - IV. Parking
 - V. Air Traffic Forecasts
 - VI. Socio-Economics
 - VII. Noise
 - VIII. Green Belt
 - IX. Human Health
 - X. Other Matters

(I) AIR QUALITY			
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1	Relevant policy pertaining to air quality is as follows: 1. North Somerset Core Strategy 2017 Policies CS3 and CS23 2. Sites and Policies Plan Part 1: Development Management Policies DM50 3. National Planning Policy Framework (2019) 4. National Clean Air Strategy 2019 5. Aviation Policy Framework (2013) 6. Airports National Policy Statement (2018) In addition, the following policy/strategy documents are also relevant to air quality: 7. Beyond the Horizon – the future of UK aviation (2017/2018) comprising: a. A Call for Evidence (2017) b. Next steps towards an aviation strategy (2018) c. Making best use of existing runways (2018) 8. Aviation 2050 (2018)	LPA additionally considers the following policies to be relevant: - The North Somerset Vision as set out in the Sustainable Community Strategy (SCS): ‘Sustainable, inclusive, safe, healthy, prosperous communities thriving in a quality environment.’ and its shared priority of “Improving health and wellbeing” - North Somerset Core Strategy 2017 Policy CS26. LPA agrees that the other policies and documents identified by the Appellant are relevant.	Agreed with the exception of the relevance of North Somerset Vision and Core Strategy Policy CS26.
2	Chapter 8 of the Environmental Statement (ES) assesses potential impacts on air quality. Further information was also submitted during the determination period to reflect the publication of the ‘Clean Air Strategy’ (2019). Chapter 8 of the	LPA agrees that these documents present an air quality assessment.	Agreed.

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3	ES has been supplemented with Chapter 7 of the Environmental Statement Addendum (ESA). The aircraft fleet forecast used in the ESA provides a robust basis for assessing air quality impacts.	Disagree. The sensitivity of the air quality impacts to change in the fleet mix/forecasting assumptions needs to be fully explored: generally, in terms of the sensitivity of the assessment to uncertainty around fleet mix, for example impacts of Covid and the year at which 12 mppa is reached; and particularly in the light of the start of Jet2.com's operations at Bristol Airport.	Disagree	
4	The pollutants assessed in the ES and ESA are appropriate.	Disagree. An acknowledgment of the potential impact of ultrafine particulates (UFP) should be provided. As there are no established methods to enable UFPs and their potential effects to be assessed, NSC has requested the provision of additional qualitative information which sets out: (a) The contribution of aviation to UFPs	Disagree	

(I) AIR QUALITY			
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5	The way in which the significance of impacts is evaluated, and the criteria used, are appropriate, robust and consistent with policy.	(b) The potential health effects of exposure to UFPs (c) Whether the proposed development would give rise to an increase in emissions of UFPs (d) The potential risks to health arising from any increase in UFP emissions. The Air Quality Expert Group report "Ultrafine particles (UFP) in the UK" (July 2018) provides useful information to support this additional information. LPA does not agree. The methodology is overly focussed upon issues relating to compliance with limit values. As such it fails to recognise the growing body of scientific research which establishes that for some pollutants there are no safe threshold levels which can be identified (e.g. for NO₂, PM₁₀ and PM_{2.5}). The methodology also fails to address the broader national and local policy agenda of needing to	Disagree

(I) AIR QUALITY				
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6	The assessment in the ESA concludes that the impacts are small and the resulting health effects are not significant.	improve health and well-being by reducing the impact of the airport on air quality going forward. The LPA does not agree that the resulting health effects are not significant. The assessment is flawed because it does not consider whether the differential impact between the with and without development scenarios presents a differential risk to health. The assessment assumes that compliance with air quality standards/objectives is the only test that is required, whereas it is also important to consider the effect of the development on air quality and health. The available scientific research demonstrates that in respect of NO₂, PM₁₀ and PM_{2.5}, there is no threshold for health effects. Further, the ES and ESA demonstrates that the proposed development will not contribute to	Disagree	

(I) AIR QUALITY			
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		improving the health and well-being of the local population – indeed, it will result in an increase in emissions of air pollutants and consequential increased risk to health compared to the position if the development did not occur. This is contrary to the objectives of the North Somerset Vision as set out in the Sustainable Community Strategy (SCS), the policy objectives of the Core Strategy generally relating to improvement of health and well-being, Policy CS26 of the CS and national policy. Since the thrust of Policy CS26 is that major development should contribute to improving health and well-being, and the proposed development would result in the contrary, namely a decrease in health and well-being, the proposed development would result in a breach of the Development Plan. This means that the impacts of the proposed development are	

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		significant for the purposes of the determination of this appeal. Specifically, the LPA expects that the Proposed Development together with any mitigation provided should result in either emissions or ground level concentrations being no greater than in the Without Development scenario.		
7	Other than with regard to the issues identified above (aircraft fleet forecast, UFPs and evaluation of significance), the quantification of impacts is appropriate and robust. This includes choice and location of receptors, and road traffic forecast data.	LPA agrees.	Agreed.	
8	Effects on ecological sites are not significant.	LPA agrees.	Agreed.	
9	Estimates of traffic associated with construction activity are well below the IAQM/EPUK screening criterion. Therefore, it is not necessary to assess further impacts from construction traffic.	LPA agrees.	Agreed.	
10	A Construction Environmental Management Plan (CEMP) will be provided (secured through a planning condition) and this is an appropriate	LPA agrees.	Agreed.	

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	mechanism to minimise any impact from dust during the construction phase. The CEMP will include the necessary mitigation measures from the IAQM methodology.		
11	Mitigation measures are embedded within the scheme and these will ensure that air quality in the vicinity of the airport is maintained at acceptable levels.	The LPA disagrees. The Council considers that BAL can only demonstrate that the proposed development will be acceptable if the residual position post-mitigation delivers an improvement in air quality and thus that a contribution to improvement in health and well-being is made. At present, there is no information before the LPA which demonstrates that the proposed measures will deliver an improvement in air quality compared to the position if planning permission were refused. The information in the ES and ESA forecasts a worsening of air quality if the Proposed Development proceeds.	Disagree
12	The proposed planning conditions and the Section 106 obligations include additional	The LPA disagrees.	Disagree

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	mitigation measures which are appropriate and sufficient to mitigate impacts on air quality.	Whilst some measures are proposed that will reduce or offset air quality impacts, BAL has not demonstrated that it has adopted "innovative solutions and incentives" nor that it has adopted "ambitious targets". BAL has not demonstrated that its mitigation package is sufficient to deliver improvements in local air quality and thus health and well-being, compared to the position that would result if the proposed development does not go ahead.	

(II) CLIMATE CHANGE			
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1	Chapter 17 of the ES examines the topic of 'Carbon and Other Greenhouse Gas Emissions'. This includes BAL's methodology for assessing carbon and other greenhouse gas (GHG) emissions. This was supplemented by Chapter 10 of the ESA (November 2020).	It is agreed that Chapter 17 contains the methodology used to assess the likely significance of carbon and other GHG emissions by BAL as supplemented by Chapter 10 of the ESA. The extent to which that methodology appropriately assesses the significance of the impacts is not agreed. The methodology has not demonstrated that with the proposed development the UK can meet the government's climate change targets prior to and including 2050. It fails to include any cumulative impact assessment. It is not agreed that the methodology assesses the impact of non-CO₂ warming effects appropriately. It is not agreed that the methodology assesses the implications of uncertainty appropriately, in particular in relation to changes to the fleet mix.	Disagree

(II) CLIMATE CHANGE			
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		For example, it does not have regard to the announcement that Jet2 is to commence operations from Bristol Airport.	
2	The calculation methodology is agreed.	The output of the methodology is agreed as a matter of mathematics.	Agreed.
3	The calculation results for construction and surface based emissions are agreed.	The calculation results are agreed as a matter of mathematics	Agreed.
4	The calculation result for aircraft emissions is not agreed since this is dependent on fleet mix assumptions which are disputed.	The LPA notes that whilst emissions projections are always uncertain, operation at the airport by Jet2 operating with an older fleet, potentially slower investment, and different destinations, uncertainty of the projections is increased and emissions likely to be higher.	Disagree
5	For the construction phase, the ES and ESA concludes that the effects from construction would not be significant.	The LPA agrees construction impacts are not the major focus of the issues relating to greenhouse gases. The LPA cannot agree that the climate change impacts are not significant	Disagree

(II) CLIMATE CHANGE			
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		since it has not been demonstrated that the proposed development can be constructed and operated on a basis which does not threaten the attainment of the government's climate change targets prior to and including 2050.	
6	The methodology used to determine Scope 1, Scope 2 and surface access emissions is robust. The projected increase in Scope 1 emissions as a result of the Appeal Proposal is 0.44 ktCO₂e. The projected increase in Scope 2 emissions is 1.41 ktCO₂e. The projected worst-case increase in surface access emissions is 47.68 ktCO₂e/yr.	The LPA does not accept that the methodology relating to Scope 1 and 2 emissions is robust given that the scale of uncertainty has not been fully established and given that it has not been demonstrated that the proposed development can be constructed and operated on a basis which does not threaten the attainment of the government's climate change targets prior to and including 2050. It has not been demonstrated that the mitigation proposed will ensure that with the proposed development emissions from Scope 1 and Scope 2 sources will attainment of the	Disagree

(II) CLIMATE CHANGE				
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7	The level of emissions for Scope 1, Scope 2 and surface access is not significant against the carbon budget for that sector.	government's climate change targets prior to 2050 and net zero as at 2050. Not agreed. It has not been demonstrated that the mitigation proposed will ensure that with the proposed development emissions from Scope 1 and Scope 2 sources will achieve attainment of the government's climate change targets prior to 2050 and net zero as at 2050.	Disagree	
8	The ES contained an over-prediction in terms of the carbon emissions from aviation. Based on the original passenger and traffic forecasts, the scale of emissions would actually be 0.17-0.20% of the 37.5 MtCO ₂ headroom recommendation, a reduction of approximately one third from that originally reported.	The LPA is satisfied that an error in the ES has been corrected in the ESA. It is correct mathematically that this is a reduction of approximately one third from that originally reported. The validity of a comparison of emissions as a percentage of a 37.5 MtCO₂ headroom is not agreed. That headroom figure was not adopted in the context of current climate change targets and is out of date. Indeed, if adopted, it would mean that the UK could not mean current climate	Disagree	

(II) CLIMATE CHANGE				
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9	The methodology assesses the significance of carbon and other GHG emissions from aviation against the 'planning assumption' for aviation of 37.5Mt CO₂ used by Government in setting the UK's five yearly carbon 'budgets' under the Climate Change Act 2008. The scale of international aviation GHG emissions in the 'With Development' case is contextualised within the current UK 'planning assumption' for international aviation of 37.5 MtCO₂. The Committee for Climate Change (CCC) 'Further Ambition' value for GHG emissions from international aviation of 30 MtCO₂, which is not current Government policy, is also considered in the ESA as a sensitivity assessment. A range of scenarios are presented to reflect the uncertainties in the projections:	change targets for the 6th Carbon Budget or net zero at 2050. BAL has not presented any cumulative assessment of carbon emissions against this or any other "planning assumption". An assessment against the 37.5 MtCO₂ headroom is flawed for the reasons explained above. The inclusion of international aviation within UK targets means that as at 2050 UK aviation will have to attain net zero. The CCC path to net zero assumes that there is demand management within the aviation sector (i.e. that it is no longer the case that all demand for aviation can travel can be met into the future). Indeed, the CCC states that in order to achieve its path to net zero any expansion in capacity will have to be offset by a reduction in capacity elsewhere in the UK.	Disagree	

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	- Upper emission scenario: This scenario assumes a relatively small amount of GHG emissions reductions in the areas listed above, and thus represents a conservative projection; - Central emission scenario: This scenario aligns with current or anticipated policy and market trends in the areas listed above. In some cases, a central point between the upper and lower emission scenarios is used; and - Lower emission scenario: This scenario assumes more substantial improvements in GHG emissions reductions in the areas listed above, and thus represents an optimistic projection. The ESA conclusions on significance contextualised by reference to materiality are robust.	Any assessment of significance should consider all available mitigations including, efficiency, Sustainable Aviation Fuel, Hydrogen, electric drivetrains, and offsets and removals. All available evidence is that the UK aviation industry will not be able to attain net zero without significant reliance upon offsets and removals. BAL has not demonstrated that with the proposed development in place, the government's climate change targets prior to 2050 and net zero as at 2050 will be attained. In that context the conclusions on significance reached by BAL are not robust.	
10	The Government has published the following policy: Decarbonising Transport: A Better, Greener Britain (July 2021)	The LPA agrees.	Agree

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	The Government has also published the Jet Zero Consultation (July 2021). BAL and NSC have submitted responses in respect of these documents.			
11	The influence of non-CO₂ warming impacts is acknowledged in the ES but not assessed as there remains scientific uncertainty on the effects and the potential for confounding mitigation measures to be implemented. The draft Carbon and Climate Change Action Plan (CCCAP) specifically refers to non-CO₂ warming impacts and the need to review the CCCAP as scientific understanding develops to ensure mitigation measures implemented are not confounded.	The influence of non-CO₂ warming impacts is not taken into account. The LPA believes that whilst uncertainties do indeed remain, they need to be taken into account. The LPA acknowledges the CCCAP could be updated to include non-CO₂ warming impacts.	Disagree	
12	In 2019 the CCC revised its recommended 'planning assumption' for the UK's aviation emissions to 30Mt CO₂. The Government has neither accepted nor rejected this recommendation. When measured against the CCC's recommended new 'planning assumption' for UK aviation (30MtCO₂) the additional emissions from	The Government has committed to net zero by 2050 including aviation. No decision has yet been announced on allocating carbon targets between sectors, but further policy is expected shortly. As a result, it is premature to grant planning permission for the proposed	Disagree	

(II) CLIMATE CHANGE			
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	expansion to 12mppa would be 0.12-1.50% based on current forecasts.	development in advance of establishing that it can come forward on a basis which is consistent with the UK's aviation sector target. On this basis, assessing the additional emissions against a 30MtCO₂ is meaningless. Significance has to be assessed against the requirement to attain the Governments targets prior to 2050 and against a target of net zero at 2050.	
13	In terms of aviation emissions, the ES and ESA conclude that increasing the capacity of Bristol Airport will not affect the ability of the Government to meet its carbon targets and that emissions would not amount to a significant effect.	The LPA disagrees. it has not been demonstrated that the Proposed Development will not have a material impact on the government's ability to meet its carbon reduction targets. With the adoption of the 6th Carbon Budget which requires a 78% cut in emissions by 2035 and Net Zero by 2050 including International Aviation and Shipping emission, there is insufficient carbon budget to enable all existing airport expansion schemes to	Disagree

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		come forward. That is why the CCC envisages demand management or capacity constraint. In advance of a comparative exercise to identify the schemes which best represent sustainable development it is premature to consent the Proposed Development since to do so would prejudice the outcome of emerging policy decisions at a national level.	
14	Within the agreed draft planning conditions forming part of the Committee Report (March 2020), there is a commitment to develop a CCCAP comprising of targets and associated carbon management initiatives. The scope of this Plan was agreed with LPA officers before the planning application went to Committee. A draft CCCAP has now been published.	The LPA welcomes the published draft CCCAP, including its commitment to Net Zero by 2030 for Scope 1 and 2, and 2050 for Scope 1,2, and 3. However, the LPA remains keen to agree the detail of this plan, in particular with a view to attaining enforceable commitment to delivery of specific measures with quantified carbon emissions reductions. The LPA is keen to gain an understanding of the likely scale of carbon emissions reductions it will deliver, against the particular UK	Disagree

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		Carbon Budget periods (especially from sixth carbon budget period, 2033-37 onwards, as well as the target for net zero in 2050), and the means for correcting under-delivery, or for enforcement if targets are missed	

(III) SURFACE ACCESS				Status of Resolution
Item No:	Appellant	LPA		
(a) Highway Capacity, Safety and Local Traffic Conditions				
1	The methodology adopted within the Transport Assessment (TA) and supplemented by the Transport Assessment Addendum (November 2020) provides a robust assessment of the effects of the Appeal Proposal on highways. The data has been checked and reviewed by NSC's highway witness and agreed as correctly input into the junction testing. Additional information has been provided to show turning flows used in junction testing.	The LPA disagrees Sufficient information was not provided to determine if a robust assessment has been undertaken. The requested data was only received on 8 June.		Disagree
2	The Appeal Proposal would not have a severe impact in highway terms, subject to implementation of all the measures to be secured through the Section 106 Agreement and conditions.	The LPA disagrees. There are significant safety and capacity issues not yet resolved. The sustainable mode share measures are not demonstrated to be sufficient.		Disagree
3	There would be no significant effects in relation to severance, pedestrian and cyclist delay, amenity, fear and intimidation and accidents and road safety as a result of the Appeal Proposal. This information has now been checked and agreed with NSC's highway witness that there	The LPA disagrees The additional traffic will have an adverse impact on local cycling and pedestrian conditions.		Disagree

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	are no significant effects on accidents or road safety.	Revised accident analysis data was only received on 8 June.			
4	The proposed highways works, coupled with all the measures to be secured through the proposed Section 106 Agreement and conditions, provide necessary and appropriate improvements to the local highway network that will (a) improve existing highways conditions, and (b) mitigate the potential highways impacts of growth to 12mppa.	The LPA disagrees The Addendum TA forecasts worsening conditions in some locations therefore impacts are not mitigated to an acceptable degree.	Disagree		
5	The proposed gyratory within the Airport site, to the north east of the Terminal, would improve traffic flows within the site and onto the A38. A supplementary technical note has been prepared to demonstrate that increasing the internal road from one to two lanes would increase capacity thereby improving traffic flows.	The LPA disagrees	Disagree		
6	The TAA has been based on highway capacity assessments which assume no increase in public transport (PT) mode share for existing passengers. The appellant has submitted a Unilateral Undertaking which proposes an increase of 2.5%	The LPA agrees with the first sentence, but this has since been superseded by CAA data and all analysis and targets should therefore be updated in line with this new data.	Disagree		

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	in the public transport modal share through to 12mppa above the re-baselined figure. This higher target would reduce the number of vehicle trips assessed in the TA and TAA. Therefore, the conclusions within the TA are robust.	The LPA disagree with the second sentence as 2.5% increase is not sufficient and has not been the subject of sensitivity testing. The LPA disagrees that the conclusions of the TA/TAA are robust as there are outstanding concerns over the mitigation and further information is still required.	
7	The TA provides a detailed review of local Personal Injury Accidents records for the local area. This review confirms that there are no existing highway safety issues within the study area that give rise to concern.	This matter has not been updated in the Addendum TA because the information was not available at that time. Updated PIA analysis was only received on 08/06/21.	Disagree
8	The Appeal Proposal will not result in unacceptable impacts on the environment and communities surrounding Bristol Airport due to traffic and parking demand. Measures secured in the Section 106 Agreement are proposed to address the impacts associated with vehicles parking offsite.	The LPA disagrees. There will be increased impact on local communities.	Disagree.
(b) Public Transport Mode Share			
1	The Appellant has historically measured PT mode share using patronage data supplied by	Agreed however future targets need to be re-baselined for all modes.	Agreed subject to further re-baselining

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	the Appellant's core bus service operators. As agreed with LPA officers, Civil Aviation Authority (CAA) passenger surveys will be used to measure overall mode share in the future, enabling a consistent comparison with other UK airports, which all use the CAA surveys. This is an appropriate approach.			
2	The 2015 CAA survey results show that Bristol Airport achieved at least 17% PT mode share (NSC committee report p.119), and 2019 CAA data shows that Bristol Airport achieved over 21% PT mode share (CAA 2019 Passenger Survey Report, Table 7c).	The LPA does not agree. The 2019 CAA data shows that Bristol Airport achieved over 21% <u>sustainable</u> transport mode share, i.e. excluding taxis. The 2015 survey data shows that Bristol Airport achieved 22.8% <u>public</u> transport mode share.	Disagree	
3	The proposed PT mode share target and measures outlined in the Unilateral Undertaking would be supported by annual monitoring and a KPI mechanism. This gives confidence that the proposed PT mode share target will be achieved.	The monitoring is agreed for measures previously discussed however new monitoring will be required for PT maximisation, however this does not provide confidence of the mode share being achieved. Specific monitoring requirements could not be agreed in the S106 and	Disagree	

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4	The stretch public transport mode share target of an increase of 2.5% linked to a significant package of public transport measures, and sustainable travel target for staff, secured through the Section 106 Agreement, and Unilateral Undertaking will result in a considerable increase in the proportion of public transport trips to the airport.	have been moved to the Unilateral Undertaking by the appellant. The LPA disagree, it is lower than existing. The LPA disagree that a 2.5% increase is appropriate for CAA methodology. The Appellant has not demonstrated the efficacy of the proposed measures or undertaken any sensitivity analysis or optioneering to demonstrate that the measures are appropriate or that the stretch target is sufficiently ambitious, by reference to what is possible to achieve.	Disagree		

IV) PARKING			
Item No:	Appellant	LPA	Status of Resolution
1	The methodology used within the Parking Demand Study, the Parking Demand Study Addendum and the Parking Demand Study Update (November 2020) is robust and appropriate. The growth rate in parking demand forecast is lower than the passenger growth rate from 8.9mppa to 12mppa. The TAA uses a different methodology since it is assessing robust highways impacts. Thus in comparing parking demand from the two approaches, it should be expected that the 'worst case' approach used in the highways impact assessment would lead to suggest a higher demand for parking than that forecast by Teneo in the Parking Demand Study Update.	The LPA disagrees. The methodology isn't consistent with the Transport Assessment and results in a higher growth rate in parking spaces than passenger numbers.	Disagree
2	The Parking Demand Study demonstrates a projected increased propensity for low cost parking demand based on passenger demographics.	The LPA disagrees. The increased propensity for low cost parking has not been demonstrated.	Disagree
3	The development of low-cost parking is a practical first step in developing further parking capacity at Bristol Airport and there is an immediate and demonstrable need for this provision.	The LPA disagrees. The need for low cost parking has not been demonstrated.	Disagree
4	The Parking Strategy identifies there are no suitable alternative sites outside of the Green Belt	It is agreed that the Parking Strategy does not identify any sites outside of the Green Belt that could be developed for an airport park and ride	Agreed

IV) PARKING			
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	that could be developed for an airport park and ride facility.	LPA facility. The LPA notes that one of the Rule 6 parties is promoting an alternative park and ride facility which will need to be considered in the Appeal	

(V) AIR TRAFFIC FORECASTS			
Item No:	Appellant	LPA	Status of Resolution
1	In producing passenger forecasts for Bristol Airport, York Aviation has adopted	LPA Subject to the resolution of other matters identified in points 2, 3 and 4 below, the LPA is	Disagree

(V) AIR TRAFFIC FORECASTS				
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	a hybrid approach combining 'top down' econometric forecasts with 'bottom up' route and airline specific forecasts for the short term. The 'top down' econometric approach enables robust consideration of macroeconomic effects, passenger choice and displacement, and long term trends. A 'bottom up', market intelligence led, process allows individual airline decisions and particular circumstances to be factored in over the period where the assumption of market equilibrium, upon which econometric models rely, is not being fulfilled. These passenger demand forecasts provide the basis for the environmental outputs used in the environmental assessment	broadly content with the basic framework of the methodology and broadly accepts the approach BAL has taken.		
2	The traffic forecasts include uncertainty analysis around the passenger forecasts and have considered three timescales for reaching 12 mppa. The potential for faster or slower growth to impact on key environmental outputs has been undertaken qualitatively and the	Further information is required regarding a number of factors before the Council can be satisfied as to the robustness of the forecasts and the assessments which rely upon them. Concerns remain in relation to a number of matters, as follows.	Disagree	

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	conclusion reached that there would not likely be significant differences. Specifically in relation to business passengers, the forecasting work undertaken suggests that over the long term the business passenger percentage will return to similar to historic levels. In relation to migrant workers, this is not a significant market for the airport now and is not expected to be in the future. In relation to fare and income elasticities, these have been based on previous work by the Department for Transport. These have been derived from an extensive, peer reviewed econometric study. The future Busy Day Timetables have been developed by reference to a base timetable for the busy day in 2019 (with some changes to the fleet mix over time) and adding movements to this based on real-world operating patterns for airlines. These added movements take account of real flight times and turnaround times for indicative new routes; for example, this results in future based aircraft operating 2	The forecast fleet mix and night movements have only been provided for the core case only (and not for the slow and fast growth cases). The lack of sensitivity testing on them is a concern as these outputs are relevant for environmental impact assessment. The bottom-up passenger forecasts haven't considered a reduction or levelling off of route frequency to EU worker markets, e.g. Eastern Europe. According to OAG data, in 2019 76% of the flights scheduled at Bristol Airport were to EU countries and 10% of these were to Eastern EU countries. To forecast business passengers, elasticities from the Department for Transport's UK Aviation Forecasts 2017 have been used. It is questioned whether these elasticities remain appropriate after the Covid-19 pandemic and Brexit. For the long term forecast an econometric passenger allocation model (logit model) has been used. This examines how passengers make choices between the different airports available based on multiple variables (e.g. flight time, quality of services, etc.). The	

(V) AIR TRAFFIC FORECASTS			
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	or 3 rotations per day starting in the early morning and ending in the late evening. Inbound aircraft movements reflect the real-world timings of these activities in the UK. Following further discussions between York Aviation and Jacobs, all issues in relation to the passenger allocation model have now been resolved with the exception of the provision of the model coefficients. These are commercially confidential and subject to intellectual property issues.	Appellant has indicated that the values assigned to each variable differ by market segment. However, the values assigned to each market segment have not been provided despite a number of requests that they should be. No reason has been given for the failure to provide this information.	
3	The passenger traffic forecasting report supporting the Environmental Statement Addendum states: “The fleet mix for the year is required for air quality, carbon assessments and some elements of the noise assessment. It is derived by allocating each airline in the BDTTs into a category (such as Low Fares, Charter, Full Service etc.) and determining the individual busy day to	BAL's traffic forecasts were produced prior to Jet2.com's announcement that they will form a base at Bristol Airport from spring 2021. Based on their announced schedules, Jet2.com is expected to become a significant operator at the airport. This is expected to affect the future fleet mix. Jet2.com has historically bought second hand or older generation aircraft, which are then	Disagree

(V) AIR TRAFFIC FORECASTS			
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	annual ratio for each of these airline types.” The future fleet mix was derived before the Jet2 announcement but BAL have consulted with Jet2 regarding future fleet assumptions for Bristol as per the other large carriers. In totality BAL believes the long term fleet replacement assumptions remain valid and, with this in mind, BAL believes the priority is to focus on the overall balance between existing and new generation aircraft rather than individual aircraft types because airlines operating at Bristol Airport may change over time, as may the individual fleets they operate.	operated for a long period, and that is reflected by the currently higher average aircraft age of Jet2.com's fleet compared to easyJet and Ryanair's. Also, easyJet and Ryanair have large orders of new generation aircraft, whilst Jet2.com has no new aircraft on order at the time of writing this Statement of Common Ground. Therefore the LPA disagrees with the assumed fleet mix in BAL's forecast and notes that this may have an impact on the carbon emissions, air quality and noise levels generated by the airport.	
4	When describing how the environmental outputs have been derived, the passenger traffic forecasting report supporting the Environmental Statement Addendum states: “These outputs are based on the Core Case forecast and provide our most likely view of how the forecast passenger numbers will be delivered. The passenger forecasts have also considered Slower	It is noted that BAL has developed the environmental outputs based on the Core Case only. The LPA considers that, in order for a decision maker to understand the implications of uncertainty, detailed quantitative analysis should be carried out for a range of scenarios (and the resulting environmental outputs provided) to understand the level of change.	Disagree

(V) AIR TRAFFIC FORECASTS			
Item No:	Appellant	LPA	Status of Resolution
	Growth and Faster Growth. The potential for these variant growth scenarios to change the environmental outputs at the point at which Bristol Airport reaches 12 mppa has been considered qualitatively, and the view reached that there are unlikely to be significant differences."		
5	The traffic forecasts identify that Bristol Airport will reach 10 mppa between 2022 and 2028, with the Core Case suggesting 2024. The traffic forecasts identify that Bristol Airport will reach 12 mppa between 2027 and 2034, with the Core Case suggesting that 12 mppa will be reached in 2030. These forecasts have formed the basis for the choice of assessment year.	The LPA agrees with these overall timelines for the passenger forecast and, as a result, the assessment years for the slow, core and fast growth scenarios.	Agree

(VI) SOCIO-ECONOMICS			
Item No:	Appellant	LPA	Status of Resolution
1	An Economic Impact Assessment (EclA) was submitted with the planning application. This was supplemented by an Economic Impact Assessment Addendum (EclAA) (November 2020). The methodology adopted in both the EclA and the EclAA is well established and represents best practice.	The LPA agrees with the methodology applied but the assessment undertaken is not comprehensive and it disagrees with some of the underlying assumptions as explained further below.	Disagree
2	The traffic forecasts suggest that business traffic percentages at Bristol Airport will return to those observed prior to the pandemic over time and certainly by the assessment year. This is based on assessment of the long-term drivers of business demand and noting that many of the factors that are being cited as a reason for reduced demand in the future have been known about for some time, notably communications technologies and sustainability considerations. The methodology for calculating associated GVA and employment is agreed to be appropriate.	The LPA disagrees with the assumption that business travel will return to the proportion of total travel that it was pre-Covid.	Disagree

(VI) SOCIO-ECONOMICS				
Item No:	Appellant	LPA	Status of Resolution	
3	Displacement has been estimated based on a detailed passenger choice model and with regard to the availability of alternate airports for travel within the different study areas.	The LPA disagrees with the assumption that displacement would only occur at the South West & South Wales region. The LPA also disagrees with the quantum of displacement assumed.	Disagree	
4	The assessment includes assumptions around productivity growth at Bristol Airport over time based on previous performance at the airport. This suggests that on-site productivity will improve by around 1.3% per annum between 2018 and 2030. Given that Bristol Airport is already an efficient airport in terms of labour productivity, this is felt to be reasonable. The gross direct, indirect and induced effects are agreed for employment and GVA. In addition, the gross inbound tourism impacts are also agreed. Hence, productivity growth is also agreed.	The productivity increase reported by the appellant does not seem sufficient.	Disagree	

(VI) SOCIO-ECONOMICS			
Item No:	Appellant	LPA	Status of Resolution
5	The construction impacts stated within the EclA are believed to be reasonable. It should also be noted that they are not deemed to be a significant effect within the ES.	The Council considers the temporary economic benefits associated with construction to be overstated.	Disagree
6	The socio-economic cost benefit analysis is intended to provide additional evidence in relation to the economic effects of the Appeal Proposal. It is a high level assessment that focusses on key effects. Negative externalities have been considered elsewhere in the ES (and the Environmental Statement Addendum) and are considered not to be significant. It was, therefore, not considered to be proportionate to include them.	The LPA disagrees with the extent to which the revised socio-economic cost benefit analysis captures all negative externalities (noise, air quality). Further, there is insufficient sensitivity testing undertaken.	Disagree

(VI) SOCIO-ECONOMICS			
Item No:	Appellant	LPA	Status of Resolution
7	The impact of outbound tourism is considered in some detail and is not considered to be likely to be a significant effect given the potential for displacement, changes in passenger behaviour, alternative modes and the benefits associated outbound tourism. It is also unclear as to the long term benefits of outbound tourism in terms of the attractiveness of an area as a place to live and work. It is also worth highlighting the UK Government's policy position, notably the lack of evidence of any negative effect on UK prosperity from outbound tourism.	The LPA disagrees with the assumption that the negative impacts of outbound tourism are minimal. The potential for the proposed development to increase overseas spend compared to the spend from additional inbound tourism is relevant and should be assessed.	Disagree
8	The EclAA estimates that the addition of 2 mppa will result in an increase in the total number of people from the South West and Wales employed on site from around 3,900 jobs (3,425 FTEs) in 2018 to 4,900 jobs (4,300 FTEs) in 2030. The gross direct employment numbers are now agreed.	The LPA does not agree these estimates as a result of the issues identified above. The LPA's position in that the EclA significantly overestimates the increase in jobs that the proposed development would deliver. Full agreement has not been reached, refer to the evidence in chief of John Siraut as to the extent that this is pursued.	Disagree

(VI) SOCIO-ECONOMICS			
Item No:	Appellant	LPA	Status of Resolution
9	The EclAA projects the following net economic impacts arising from the proposed increase in passenger numbers to 12mppa: • For North Somerset, the economic impact is likely to increase to £70 million (in GVA terms) and around 710 additional jobs (570 FTEs). • For the 'West of England', the impact is likely to increase by £220 million and around 2,460 additional jobs (2,040 FTEs). • For South Wales and South West, the impact is likely to increase by £310 million and around 4,000 additional jobs (3,210 FTEs). Overall, the EclA socio-economic cost benefit analysis estimates that the net present value (NPV) associated with raising the airport's capacity from 10 mppa to 12 mppa is between £820 and £863 million over the next 60 years.	The LPA disagrees and its position is that these impacts are overstated.	Disagree

(VI) SOCIO-ECONOMICS				
Item No:	Appellant	LPA	Status of Resolution	
10	The EcIA concludes that the economic benefits associated with the Appeal Proposal will be significant.	The LPA disagrees on the magnitude of the economic benefits. Considered in context, the benefits that would be delivered are not significant in relation to the disbenefits of the proposed expansion.	Disagree	
11	The EcIA considers the potential negative impacts of increased outbound travel from Bristol Airport and concludes that there will be no significant adverse impacts.	The LPA believes there should be further consideration given to the material economic effects of increased outbound travel.	Disagree	
12	The EcIA anticipates that the Appeal Proposal will support around 100 additional jobs in Weston-super-Mare and 90 additional jobs in South Bristol, helping to help improve levels of deprivation in these areas. A Skills and Employment Plan forms part of the Section 106 Agreement, the detail of which will be agreed. The scope of this Plan was agreed with NSC officers. This will maximise the opportunities associated with the growth of the airport for local communities.	Based on the LPA's view that future employment at the airport will be materially less than estimated by the applicant it requires further assurance that these benefits remain realistic and can be delivered. The LPA seeks a clear and enforceable commitment that these jobs will be delivered and retained for the population of these areas. At present, the LPA is unclear how the regeneration of deprived areas claimed as a benefit in BAL's statement of case will be delivered and/or secured.	Disagree	

(VII) NOISE			Status of Resolution
Item No:	Appellant	LPA	
(a) Air Noise			
1	The ES and ESA assessments use the $L_{Aeq, 16h}$ and $L_{Aeq, 8h}$ metrics, for daytime and night-time respectively, to assess air noise. These are appropriate metrics to use to assess the impacts of air noise.	The LPA disagrees. The $L_{Aeq, T}$ metric is agreed to be one of, but not the sole, appropriate metric against which to assess the significance of noise effects. In addition Number Above 60 dB and 70 dB, Single mode contours, which assume either 100% easterly or westerly operations should be considered and for night time noise and assessment of impacts on schools consideration of awakenings using the L_{AFmax} SEL and L_{Asmax} metrics respectively should also be used. The LPA considers that the Air noise impact ratings - change in noise level, outdoors used in the ES and addendum underestimate the degree of impact of changes in L_{Aeq16} hr day and L_{Aeq8} hr night noise levels There are other supplementary indicators that were used to provide	Disagree

(VII) NOISE					
Item No:	Appellant	LPA	Status of Resolution		
			context in the ES which have not been updated in the ESA. The LPA considers that these should be updated in order to fully evaluate the significance of the effect of the noise impacts of the proposed scheme.		
2	In the ES and the ESA, the baseline and projected noise levels were produced using the Federal Aviation Authority (AEDT) software program, Version 2d for the ES and Version 3C for the ESA. The software contains default noise levels for various aircraft types. These were modified as necessary based on real-world measurements taken at Bristol Airport for existing aircraft, and based on noise certification data for aircraft not yet operating at Bristol Airport. This method is appropriate and the noise levels presented in the ES and ESA are an accurate representation of the forecasts.	LPA agrees that the use of this software is appropriate. However, the LPA considers that the default noise levels in the AEDT do not necessarily reflect exactly how various aircraft types produce noise when in actual operation at a particular airport or by a specific airline or pilot. Consequently, the ES and ESA includes corrections to the AEDT noise data derived from measurements at the airport for most of the aircraft, but not for the Boeing 737 Max 8 and 10 types for which the AEDT data is relied upon as there is not sufficient Bristol	Disagree		

(VII) NOISE					
Item No:	Appellant	LPA	Status of Resolution		
		Airport measurement data for this aircraft. The AES at para 6.4.2 states the corrections that were derived for the A321 and A320 aircraft were approximately 1 dB for arrivals and 3 dB for departures. It is conceivable a similar correction could apply to the B737 Max. Whilst this does mean a modest degree of uncertainty arises regarding the “accuracy” of the noise predictions it is accepted that this is the best that can be achieved given the circumstances.			
3	In accordance with the Noise Policy Statement for England, the ES and ESA define daytime and night-time values for the ‘Lowest Observed Adverse Effect Level’ LOAEL and the ‘Significant Observed Adverse Effect Level’ SOAEL. A value for the ‘Unacceptable Adverse Effect Level’ UAEL is also defined. Seeking to assign values to these thresholds is appropriate.	The setting of SOAEL is acceptable with the exception of SOAEL at night. The use of a 55 dB LAeq,8 hrs as SOAEL at night is not appropriate as this does not take into account increased sleep disturbance due to the occurrence of intermittent noise events in this rural location with low noise conditions.	Disagree		

(VII) NOISE			Status of Resolution
Item No:	Appellant	LPA	
		The LOAEL value at night is not agreed. The LPA considers that the rural nature of the surroundings warrants a lower LOAEL at night of 40dB in accordance with the World Health Organisation Night Noise Guidelines. The use of the LOAEL and SOAEL values needs to be seen in the context of an increasing body of evidence that the public are becoming more sensitive to noise over time. The Council considers that there is no single authoritative dose response that can be relied solely to robustly evaluate aviation noise effects and alternative dose responses should be used as sensitivity tests to any "primary" does response used.	

(VII) NOISE					
Item No:	Appellant	LPA	Status of Resolution		
4	For daytime noise, a LOAEL of 51 dB $L_{Aeq,16h}$ and a SOAEL of 63 dB $L_{Aeq,16h}$ are appropriate.	Agreed, although regard must be had to other metrics. The Council considers that there is no single authoritative dose response that can be relied solely to robustly evaluate aviation noise effects and alternative dose responses should be used as sensitivity tests to any "primary" dose response used.	Disagree		
5	For the UAEL, values of 69 dB $L_{Aeq,16h}$ for daytime and 63 dB $L_{Aeq,8h}$ for night-time are appropriate.	The daytime figure is agreed, although the NPPF does not recognise a category of UAEL. In policy terms the NPPF approach is that all noise levels above SOAEL are unacceptable. The night time figure is not agreed. Further regard must be had to other metrics. The Council considers that there is no single authoritative dose response that can be relied solely to robustly evaluate aviation noise effects and alternative dose responses should be used as sensitivity tests to any "primary" dose response used	Disagree		

(VII) NOISE				
Item No:	Appellant	LPA	Status of Resolution	
6	Baseline noise surveys (day and night) were undertaken during March-April 2018 at various locations. The survey period and survey locations are appropriate. The results of the long-term noise monitoring are agreed.	Agreed	Agreed.	
7	The air noise assessment considered both the absolute noise level and the change in noise level in order to determine significance. This is an appropriate method of determining significance in relation to the L_{Aeq} metric.	This is not agreed. The assessment does not recognise the impact upon quality of life that even small changes in L_{Aeq}, 16hr can have. Such changes represent substantial increases in the number of noticeable noisy events which adversely affect quality of life. There are a number of sensitivities and uncertainties not accounted for in the ES including that the ES does not consider a scenario where the noise performance of the aircraft types is not as indicated by the AEDT designation, and only one set of assumptions of fleet mix has been assessed quantitatively. It cannot therefore be concluded that the outcomes of the assessments	Disagree	

(VII) NOISE				Status of Resolution
Item No:	Appellant	LPA		
		reported in the ES and ESA are accurate and robust. In addition, the LPA considers that the fleet mix should be revisited to reflect the reality of the commencement of Jet2.com's operations at Bristol Airport. As this airline utilises primarily older aircraft, this is likely to affect noise contours at 12mppa.		
8	Other supplementary noise metrics are used in the ES (and ESA) to assess noise impacts, including the N70 and N60 indices which are derived from the maximum noise level of an aircraft, L_{Amax}. These are appropriate measurement values and the results are an accurate assessment.	Not agreed. The supplementary indicators that were used to provide context in the ES have not been updated in the ESA which is considered to be a serious omission. The assessment using these indicators is thus not up to date. Also, as previously indicated, the LPA considers that the fleet mix should be revisited to consider the start of Jet2.com's operations at Bristol Airport. As this airline utilises		Disagree

(VII) NOISE				
Item No:	Appellant	LPA	Status of Resolution	
		primarily older aircraft, this is likely to affect noise contours at 12mppa.		
9	The ES and ESA assess the number of people likely to be highly annoyed by air noise. The methodology was to utilise the results of the SoNA study published in 2017. This is the most appropriate current UK guidance to assess annoyance.	Whilst it is agreed that SoNA can be used to assess annoyance, no single dose response methodology is ideal. SoNA has its shortcomings. Other methodologies such as that contained in the WHO European Noise Guidelines 2018 (ENG18) should also be used in order to provide as informed a picture to decision makers as possible.	Disagree	
10	The ES and ESA assess the number of people who are likely to be highly sleep disturbed. The methodology was to establish the figures is based on the DEFRA guidance: <i>'Environmental Noise: Valuing impacts on: sleep disturbance, annoyance, hypertension, productivity and quiet'</i> , 2014. This is the most appropriate current UK guidance to assess the number of people highly sleep disturbed.	The use of Lnight is agreed as an appropriate assessment tool, albeit that regard must be had to other assessment methodologies to as informed a picture to decision makers as possible. The LPA does not consider that the SOAEL has been set without regard to the low background noise levels that are typical of the rural surroundings and is therefore inappropriate.	Disagree	

(VII) NOISE			Status of Resolution
Item No:	Appellant	LPA	
		The omission of an assessment of additional awakenings due to aircraft noise at night as per the Basner et al method based on the LAs,max and the number of times a night they occur is not in line with good practice and undermines the validity of the conclusions drawn in the ES regarding effects of noise at night on health. Solely assessing the number of people highly sleep disturbed is inadequate, especially where the noise is not continuous and occurs intermittently i.e is from ATMs, and evaluation of the likelihood of additional awakenings based on the maximum noise levels and number of ATMs at night, and sleep disturbance due to fractioning of the sleep cycle leading to reduced sleep quality as well as quantity, are also required in order to provide a robust assessment.	

(VII) NOISE				
Item No:	Appellant	LPA	Status of Resolution	
11	Overall, the number of dwellings exposed to significant levels of aircraft air noise during the daytime period will generally stay the same. The number of dwellings exposed to significant levels of air noise during the night will increase by around 1 dB, a negligible amount.	The LPA does not agree that the noise impacts of the proposed development are insignificant. The number of people exposed to levels above SOAEL increases. The approach in national planning policy is that exposing people to levels above SOAEL is to be avoided and that planning permission should be refused. The proposed development thus conflicts with the NPPF and the development plan. Changes in the noise environment which are contrary to the NPPF and the development cannot be described as insignificant. They weigh heavily against the grant of planning permission. Further, as previously indicated, the LPA considers that the fleet mix should be revisited to consider the start of Jet2.com's operations at Bristol Airport. As this airline utilises primarily older aircraft, this is likely to affect noise contours at 12mppa	Disagree	

(VII) NOISE			
Item No:	Appellant	LPA	Status of Resolution
12	Proposals to change approved arrival/departure routes or wider airspace change is dealt with under an 'Airspace Change Process', regulated by the DfT and CAA which is outside of the planning process.	The LPA agrees however the uncertainties that arise to the assessment of the impact of the proposed development as a result have to be considered and taken into account by the planning decision maker.	Agreed
13	The ES and ESA conclude that noise associated with the Appeal Proposal will not result in significant health impacts.	The LPA disagrees. There will be an increase in the number of people adversely affected by noise including those at levels above SOAEL. This will include increased awakening at night. These impacts are contrary to the NPPF and development plan policy. They will give rise to a material risk to health. The adverse impact of noise associated with the Proposed Development upon health and quality of life will be significant. Also, as previously indicated, the LPA considers that the fleet mix	Disagree

(VII) NOISE				
Item No:	Appellant	LPA	Status of Resolution	
		should be revisited to consider the start of Jet2.com's operations at Bristol Airport. As this airline utilises primarily older aircraft, this is likely to affect noise contours at 12mppa		
(b) Ground Noise				
1	Ground noise has been assessed in the ES using the $L_{Aeq,16h}$ and $L_{Aeq,8h}$, average noise metrics for day and night-time noise impacts. The dB(A) levels used to describe the thresholds of LOAEL and SOAEL for ground noise are appropriate.	The thresholds for LOAEL and SOAEL for ground noise and the methodology for assessment of ground noise are not agreed or regarded as "robust" by the LPA, because the approach used in the ES is likely to have underestimated impacts to ground noise due to: • Tonal and other aggravating characteristics of the noise have not been accounted for. • The time averaging periods being substantially longer than the duration of the noise leading to "smoothing down" of the level.	Disagree	

(VII) NOISE				Status of Resolution
Item No:	Appellant	LPA		
2	It is appropriate to assess the ground noise effects of the proposed growth of the airport against a future baseline that reflects its growth without the proposed development. The Appeal Proposal will give rise to a negligible adverse ground noise effect compared to the future baseline if the development does not go ahead and so its ground noise effects are not significant.	Disagreed. The following is required: • Assessment against current baseline noise conditions as a sensitivity test to account for the uncertainties in the prediction of future baseline related to the assumed rate of ATM growth and fleet mix. • Inclusion of tonal and other aggravating characteristics of the noise in the assessment. • The use of appropriate time averaging periods. • Provision of a BS 4142 assessment It is not agreed that the Appeal Proposal will give rise to a negligible adverse ground noise effect		Disagree
3	In the ES and the ESA, the baseline and projected noise levels were produced using the	The methodology followed is appropriate and the noise levels		Disagree

(VII) NOISE				Status of Resolution
Item No:	Appellant	LPA		
	CadnaA software program, following the ISO 9613-2 methodology. The software requires reference noise levels and durations for various aircraft activities. These were derived from measurements taken by Bickerdike Allen and Partners at Bristol and other airports. This method is appropriate and the noise levels presented are an accurate representation of the forecasts.	presented are an accurate representation of the forecasts. As previously indicated, the LPA considers that the fleet mix should be revisited to consider the start of Jet2.com's operations at Bristol Airport. As this airline utilises primarily older aircraft, this is likely to affect noise contours at 12mppa		
(c) Road Traffic Noise				
1	The ES and ESA assessed road traffic noise. These assessments used the $L_{A10,18h}$ metric as is standard for UK road traffic noise assessments. This is appropriate.	The LPA agrees that the assessment is in line with the advice of the Highways England Design Manual of Roads and Bridges. This guidance would rate the predicted increases in road traffic noise as negligible.	Agreed	
2	In the ES and the ESA, the baseline and projected noise levels were produced using the CadnaA software program, following the CRTN methodology. This is appropriate and the noise levels presented are an accurate representation of the traffic flows.	The LPA agree that the assessment is in line with the advice of the Highways England Design Manual of Roads and Bridges. This guidance would rate the predicted	Agreed	

(VII) NOISE				Status of Resolution
Item No:	Appellant	LPA		
3	Both the ES and ESA found that the increase in noise level due to the proposed development was less than 1 dB L _{A10,18h} for all assessed receptors. This level of change is not considered significant.	increases in road traffic noise as negligible. The LPA agree that the assessment is in line with the advice of the Highways England Design Manual of Roads and Bridges. This guidance would rate the predicted increases in road traffic noise as negligible.		Agreed
(d) Construction Noise				
1	The ES assessed the potential noise impacts of the construction of the proposed development. Criteria were set following guidance in BS5228-1:2009. This is appropriate.	Agreed		Agreed
2	Predictions of construction noise levels were made using the methods described in BS5228-1:2009. This is appropriate.	Agreed		Agreed
3	The assessment found that there was a potential significant daytime construction noise effect during the A38 highway improvement works, in the absence of any mitigation. This is best dealt with through a Construction Environmental Management Plan (CEMP).	Agreed		Agreed

(VII) NOISE			
Item No:	Appellant	LPA	Status of Resolution
4	The assessment found no potential significant night-time construction noise effects.	Agreed	Agreed
(e) Vibration			
1	The ES considered the potential effects of vibration from both construction and the operation of aircraft. No potential significant effects were identified.	Agreed	Agreed

(VIII) GREEN BELT			
Item No:	Appellant	LPA	Status of Resolution
1	The methodology used within the Parking Demand Study, the Parking Demand Study Addendum and the Parking Demand Study Update (November 2020) is robust and appropriate.	The LPA disagrees. In particular, the methodology isn't consistent with the Transport Assessment and results in a higher growth rate in parking spaces than passenger numbers.	Disagree
2	The Update to the Parking Demand Study November 2020) identifies a requirement for 4,200 spaces at 2030.	The LPA disagrees with the methodology used to establish the parking demand and the resulting figures.	Disagree
3	The Parking Demand Study and Parking Demand Study Update demonstrate a projected increased propensity for low-cost parking.	The LPA disagree. The increased propensity for low cost parking has not been demonstrated.	Disagree
4	The development of low-cost parking is a practical first step in developing further parking capacity at Bristol Airport and there is an immediate and demonstrable need for this provision.	The LPA disagrees. The need for low cost parking has not been demonstrated.	Disagree
5	The Parking Strategy identifies that there are no suitable alternative sites outside of the Green Belt that could be developed for an airport park and ride facility.	Whilst it is agreed that the Parking Strategy does not identify any alternative sites outside of the Green Belt that could be developed for an airport park and ride facility, the LPA notes that one of the Rule 6 parties is promoting an alternative park and ride	Agreed

(VIII) GREEN BELT				
Item No:	Appellant	LPA	Status of Resolution	
		facility which will need to be considered in the Appeal.		
6	Bristol Airport is in the Green Belt with the exception of land on the north side known as the Green Belt inset.	The LPA agrees.	Agree	
7	Taking into account delivered and consented capacity for parking, there is insufficient space within the Green Belt inset to accommodate further surface level car parking.	The appellant has planning permission for multi-story car parking (MSCP2) inside the Green Belt Inset which it has failed to deliver. A further multi-storey car park is proposed as part of this appeal. BAL has not proven to the LPA that it is not feasible or practical to provide further car parking in the Green Belt Inset. The Appellant focuses narrowly on surface level car parking without considering car parking in the round.	Disagree	
8	Taking into account the inclusion of MSCP3 within the Appeal Proposal, and further to the completion of MSCP2, BAL has maximised development within the inset.	The LPA disagrees. BAL has not proven to the LPA that it is not feasible or practical to provide further car parking in the Green Belt Inset.	Disagree	
9	The proposed year-round use of the existing Silver Zone Car Park (Phase 1) extension and the further extension to the Silver Zone Car Park (Phase 2) is	The LPA agrees that the proposed year-round use of the existing Silver Zone Car Park (Phase 1) extension and the further extension to the Silver	Agreed	

(VIII) GREEN BELT			
Item No:	Appellant	LPA	Status of Resolution
	inappropriate development for the purposes of the NPPF and Policy DM12.	Zone Car Park (Phase 2) is inappropriate development for the purposes of the NPPF and DMP policy 12.	
10	The existing landscape bund to the south of the Silver Zone Car Park extension (Phase 1) has successfully screened close range views and long range views are seen in the context of the existing development. There have been negligible environmental impacts as a result of this car park extension.	The LPA considers that the landscape bund reduces (but does not eliminate) some (but not all) views of the Silver Zone Car Park extension. The LPA does not accept the suggestion that the screening is successful or that there are negligible impacts as a result.	Disagree
11	Unofficial car parking sites refers to off-site car parking sites that operate without express planning permission or lawful development certificates. In BAL's experience, some unofficial car parking operate under 28-day temporary permitted development rights but the vast majority are unauthorised and operate without the benefit of any planning permission.	The LPA agrees with this description of unofficial car parking sites in general terms, save that no evidence has been presented to demonstrate the appellant's assessment of a 'vast majority'. Through planning enforcement work, the LPA is aware that there are a number of unofficial car park sites in operation.	First sentence agreed, second sentence not agreed.
12	The proposed year-round use of the existing Silver Zone Car Park (Phase 1) extension and the further extension to the Silver Zone Car Park (Phase 2) will result in only limited harm to the openness of	The LPA disagrees and considers that (1) BAL has underplayed the harm to the openness of the Green Belt; (2) the development conflicts with the	Disagree

(VIII) GREEN BELT			
Item No:	Appellant	LPA	Status of Resolution
	the Green Belt and 'very special circumstances' clearly outweigh this harm.	purposes of including land within the Green Belt; and (3) very special circumstances have not been demonstrated.	

(IX) HUMAN HEALTH			
Item No:	Appellant	LPA	
1	Policy CS26 of the Core Strategy is not a relevant policy for the Appeal Proposal, beyond the requirement for some proposals to be supported by a Health Impact Assessment (HIA).	The LPA disagrees. Policy CS26 was referenced in the reasons for refusal.	Disagree
2	The Health Impact Assessment (HIA) for the Appeal Proposal was undertaken in accordance with good practice and its methodology and scope was proportionate and appropriate. This was agreed with the Council's Public Health Team and Public Health England (PHE). During the construction phase, the HIA identifies potential adverse health impacts but notes that these impacts can be reduced to minor levels. This mitigation will be controlled through the CEMP, which is secured in the proposed draft planning conditions. During operation, significant beneficial effects are predicted associated with economic and travel benefits.	The LPA disagrees. The HIA fails to capture the full range of adverse health impacts in relation to noise impact and air quality impacts. PHE raised concerns about the reliance on sound insulation for night noise effects which is not evidence based and noted potential interaction effects between the wider determinants of health (e.g. noise, air quality, community cohesion), which could lead to cumulative effects not captured in the assessment. They also recommended that in respect of noise, additional health outcomes are also considered, including cognitive impairment in children in local schools, and cardiovascular disease and additional awakenings	Disagree

(IX) HUMAN HEALTH			
Item No:	Appellant	LPA	
		which the LPA considers has not been addressed.	

(X). OTHER MATTERS

Further to those matters agreed above, the table below sets out, on a topic by topic basis, other technical matters discussed between the Appellant and the LPA but which are not cited in the LPA's reasons for refusal.

Topic	Appellant	LPA
Policy	Aside from the policies cited in the reasons for refusal, the Appeal Proposal is in accordance with all other relevant policies in the Development Plan.	The policies in the development plan which are stated in the reasons for refusal are CS1, CS3, CS10, CS23, CS26 and DM12. These are the principal policy conflicts. There are other policies within the development plan, e.g. CS 11 and CS 24, which cover the same topics. These policies are not relied on in founding the reasons for refusal, but this does not mean that the proposed development is in accordance with those policies. All relevant policies need to be considered and the development plan needs to be read as a whole
Need for the Appeal Proposal	The Passenger Traffic Forecasts for Bristol Airport to Inform the proposed development to 12 mppa (York Aviation, 2020) demonstrate a need to increase the capacity of Bristol Airport beyond its current passenger cap of 10mppa.	The Council accepts that there is likely to be an unconstrained demand which will exceed the capacity of its current passenger cap of 10mppa. The Council does not accept that this can be categorised as a need to expand, particularly in the light of the CCC 6th Carbon Budget Report which identifies that a predict and provide model is no longer consistent with the UK's carbon emission obligations and the achievement of the Net Zero 2050 target.
Making Best Use	The Appeal Proposal will make best use of the existing runway in accordance with national aviation policy.	The LPA does not agree that the Appeal Proposal is in accordance with Making Best Use (June 2018).

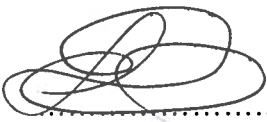
Topic	Appellant	LPA
Land contamination	The ES conclusions that the risk of contamination associated with the construction and operation of the Appeal Proposal affecting sensitive receptors is low and significant effects on land quality are not predicted are appropriate and robust. Further ground investigations will be undertaken prior to commencement of development and this is secured through the proposed draft planning conditions.	The LPA agrees. This is a matter that can be addressed through appropriate conditions.
Agricultural Land Quality	The Appeal Proposal will result in the loss of best and most versatile (BMV) agricultural land in order to accommodate the proposed extension to the Silver Zone car park (Phase 2). No alternative sites were identified leading up to the planning submission and given the relative small scale of land that will be lost (0.01% of all BMV agricultural land in North Somerset) and its use for grazing rather than crop production, the loss of BMV land will not be significant.	A site for an alternative off-site Park & Ride airport related car park is being promoted by one of the Rule 6 parties at this appeal.
Landscape and Visual	The ES concludes that there will be no significant landscape effects as a result of the Appeal Proposal. Visual impacts will be limited and where significant impacts are identified, these are identified as significant in Year 1 but will lessen as planting around the site boundary becomes established and will not be significant by year 15 of the Appeal Proposal's operation. This will be	The LPA agrees that here will be significant landscape impacts in Year 1 but that over time these will diminish as mitigation becomes established. By Year 15 significant visual impacts are less likely, subject to the implementation of a landscape, Visual and Ecology Mitigation Masterplan.

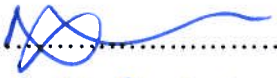
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	secured through the Landscape, Visual and Ecology Mitigation Masterplan as part of the proposed draft conditions.	
Ecology	The ES concludes that the construction and operation of the Appeal Proposal will result in only negligible and not significant adverse effects on statutory and non-statutory designated sites, priority habitats and species. This assessment is appropriate and the conclusions are robust. In accordance with the Mendip Bats Special Area of Conservation (SAC) Guidance on Development Supplementary Planning Document ("SPD"), suitable mitigation has been identified and secured in the proposed draft planning conditions to ensure that there would be no adverse effects on the integrity of the SAC. Overall, the proposed mitigation and enhancement measures secured through planning conditions will result in a net gain of ecologically valuable habitats.	It is agreed that the scale and type of the proposed ecological enhancement together with on-going management complies with the relevant requirements and policies. Replacement habitat and enhancement measures are proposed and once these are secured, the proposals will comply with the NPPF and policies CS4 and DM8. With the enhancement proposed net biodiversity gain can and will be achieved via appropriate management measures which are to be secured by condition and planning obligation. Net gain will be secured should the enhancement measures be secured prior to the loss of existing habitats.
Historic Environment	The ES concludes that, with mitigation, the Appeal Proposal will have no harm on any heritage assets.	The LPA agrees that the Proposed Development will not cause harm to the significance of any relevant heritage assets.
Water (including flood risk)	The surface water and flood risk assessment contained in the ES concludes that the Appeal Proposal will not increase flood risk to offsite receptors and will protect water quantity and	The LPA agrees.

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	quality. The assessment is appropriate and the conclusions are robust. For groundwater, the ES concludes that, taking into account the implementation of measures to be contained within the CEMP as well as other embedded mitigation, effects will be minor/negligible and not significant. The assessment is appropriate and the conclusions are robust. The proposed planning conditions adequately secure the LPA's written approval of the final working details for the drainage scheme before construction begins.	
Design	The Appeal Proposal provides for all of the elements that are required for Bristol Airport to accommodate a throughput of 12 mppa. The BREEAM Pre-Assessment Report concludes that a BREEAM rating of 'very good' can be achieved whilst striving for excellent. These conclusions are robust and the proposed Planning Conditions appropriately secure this.	The LPA do not agree that the proposal provides for all other elements that are required for Bristol Airport to accommodate a throughput of 12 mppa, in that the proposed development does not propose to deliver Multi-Storey Car Park 2 or a public transport interchange. These are matters which the LPA consider should be delivered and should be secured through planning conditions and planning obligations. The LPA does however agree that the proposal can deliver BREEAM 'Very Good' subject to conditions.
Noise – Road Traffic	There is a negligible increase in noise exposure for those dwellings affected of less than 1 dB constituting a very low effect.	The LPA agree that the assessment is in line with the advice of the Highways England Design Manual of Roads and Bridges. This guidance would rate the predicted increases in road traffic noise as negligible.

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	There would be no change in the number of receptors exposed to an effect level of LOAEL, SOAEL and UAEL because of road traffic noise. The assessment is appropriate and the conclusions are robust.	
Noise - Construction	Any potential noise and vibration impacts can be mitigated through a CEMP, which is secured in the proposed draft planning conditions, and therefore there will be no significant effects.	LPA agrees.
Green Belt	The proposed enhancements to airfield infrastructure are not inappropriate development in the Green Belt. The proposed A38 highway improvement works are not inappropriate development in the Green Belt.	The LPA did not refuse to grant planning permission on the basis that the new airfield infrastructure and A38 highway works were inappropriate development. However, having reviewed the proposed development in the round, the LPA's planning witness has reached his own view that these elements are in fact inappropriate development.
Cumulative Effects	The ES and the ESA conclude that no significant adverse inter-project effects are anticipated from the Appeal Proposal together with the extant 10 mppa consent and ongoing operational development. There is one beneficial inter-project effect of moderate significance on the collective health benefits from employment and investment. The combination of the potential changes in air quality, noise, vibration, visual, land quality, water quality and flood risk for most of the human	The Proposed development has not been appropriately assessed on a cumulative basis in terms of carbon emissions as explained above. The assessment fails to assess/capture the full range of adverse effects upon the local population/community. The proposed development will result in material adverse impacts upon health and quality of life resulting from changes in noise and air quality which result in a breach of the NPPF and the Development Plan.

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	receptors on and surrounding the application site is considered to result in minor effects that are not significant. There are no significant cumulative effects beyond those already concluded in the alone assessments. The approach to assessment of cumulative and inter-related effects is appropriate and the conclusions are robust.	These impacts upon health and quality of life are material in isolation and cumulatively. They occur in a policy context which anticipates that changes in technology should lead to an improvement in health and quality of life.

Signed 
Organisation Bristol Airport Ltd.
Date 8/10/21

Signed 
Organisation NORTH SOMERSET COUNCIL
Date 8/10/21