

PCAA response to Master Plan Consultation – Stage II Development Proposals and Options May 2018

The PCAA met on 16 May and decided that the consultation put forward was extremely confusing for the public as it includes proposals to raise capacity to 12 million passengers a year (mppa) whilst also proposing growth to 20 mppa. The website surrounding the consultation is difficult to navigate. It is extremely disappointing that the consultation documents don't address issues put forward in our initial response which concern the impacts of airport expansion on residents and the environment. The PCAA met again on 28 June and agreed this response.

Bristol Airport suggested to the public three scenarios. In this consultation, the airport has avoided showing the impacts of each scenario and has put forward to the public a 'Pick and Mix' approach of all scenarios to 2040. Development to 12 mppa is mainly based on scenario A with some of B and beyond 12 mppa there is extensive use of scenarios B and C.

Section 1 - Growth to 2040:

It is impossible to make an informed comment on the timescale to 2040.

Firstly, experience has shown the PCAA that it is a complete waste of time detailing our concerns on issues surrounding further growth as the last Master Plan was not reflected in the subsequent planning application. Also, due to permitted development rights at airports, changes to planning applications are made constantly and with little or no scrutiny. For example, permitted development rights have allowed an additional aircraft stand over the number agreed in the planning consent and the change of location of the administration block which is now larger in size than consented and on the South side of the airport in green belt. This indicates that although Bristol Airport might write fine words it carries out the actions it wants rather than what was approved.

Secondly, climate change is now such a serious issue that aviation may have to be limited in future. As Bristol Airport knows, aviation is one of the fastest growing sources of emissions and we know that emissions at altitude are a lot more damaging to the climate than at ground level. We also know that technological advances may not be brought forward in the timeframe and 89 organisations worldwide have called on the UN's International Civil Aviation Agency (ICAO) to stop plans for aviation biofuels and carbon offsets. This is in part due to use of palm oil which leads to increased deforestation. Carbon offsetting, proposed by Bristol Airport, is not a pathway to reduced emissions. Approval of Heathrow Airport 3rd runway will also impact on future expansion at Bristol Airport. Lord Deben and Baroness Brown of Cambridge, from the Committee on Climate Change, reminded the Government that it has a legally binding commitment to reduce greenhouse gas emissions under the Climate Act. Their letter is dated 14 June 2018 on the Airports National Policy Statement which can be viewed at <https://www.theccc.org.uk/publication/ccc-writes-to-chris-grayling-about-airports-national-policy-statement/> It can no longer be argued that Bristol Airport's carbon emissions are a minuscule amount as the cumulative impact, with other airports expanding in the UK and elsewhere and with

other developments, will take us beyond 1.5 degrees which is what expected under the Paris Agreement.

Thirdly, if the airport wishes for comment on these proposals, more information is required such as airspace changes. This may impact on additional parishes which are completely unaware that their communities may be affected by ground and air noise.

Fourthly, the PCAA do not believe that public funding for infrastructure is possible due to Brexit and continued austerity within the UK. Bristol Airport's accounts indicate that they are unable to contribute substantial sums to new infrastructure but will use available finance to fund infrastructure on site to allow for growth. This will leave local communities suffering from increased traffic with little or no infrastructure improvements.

Consultation point design options:

Question A: The entrance gateway:

There is no doubt that the Airport gateway will further urbanise the landscape surrounding the airport. It is impossible to comment until this information is made available in the Master Plan and the impacts on parishes and their residents understood.

Today, 85% of all passengers travel to and from the airport by car. Bristol Airport's aim is to deliver '*a substantial increase in the proportion of journeys made by bus and coach*' towards 2030 (on page 22). There is currently debate on whether the Bath bus will still run in future. So the PCAA question what Bristol Airport mean by 'substantial' and highlight that car travel will increase carbon emissions until cars go electric expected in the UK in 2040. Within the Surface Access Charter on page 23 it states '*a long term shift towards more sustainable modes of transport to and from the airport by the mid-2030's*'. So which is it? Is it for 2030 or mid 2030's possibly as late as 2035! A condition should be set to deliver at least 50% of all passengers by 2030 by public transport. There is only a 'possible introduction' of a mass transit towards 2040. There is no doubt that local residents and communities are going to carry the burden of increased congestion on local lanes, roads across the North Somerset and BANES and the A38 and A370. This is contrary to the West of England Joint Spatial Plan and North Somerset Core Strategy which advocates that there should be no loss of well being but an increase in quality of life for residents.

The public transport interchange was promised under the planning consent of 2011. There should be no increase in passenger numbers beyond 10 mppa until this is constructed and in operation and, as stated on p27 of the consultation document, until the second multi-storey car park is built. The public transport interchange should not just be for delivery of passengers to and from the airport but, as the title suggests, for the general public. Parking should be provided for residents from the Chew Valley at prices equivalent to those at local rail stations of Yatton and Nailsea to allow people easy access to other locations as well as Bristol. The drop-off zone to access the public transport interchange should be free. Local people will suffer from so many of

the impacts of airport growth, they must have the opportunity to benefit in some small way.

Question B: The airport's boundary and public areas:

It appears from the consultation document that the boundary changes to enhance the natural habitat and mitigate the visual impact are to be outlined in the Draft Master Plan later this year. Thus the PCAA cannot comment but it also appears that this is aimed at the long-term, for growth beyond 12 mppa.

The PCAA objects in the strongest possible terms to any further airport operational and related land being released from the green belt designation. The PCAA do not believe that there is sound evidence and exceptional circumstances for land to be released on an overall basis. Our preference is for underground car parks to save any further development on green fields as numbers move towards 20 mppa. Following this approach at 12 mppa would take away the need for additional surface car parking, proposed as an extension to the Silver Zone Car Park, to be located immediately south of the existing car parking areas on the land known as 'Cogloop'. The new Administration Block has been relocated to the South side in green belt using permitted development rights regardless of views of parishes and Bristol Airport has made it known that it is seeking through the local plan process to have all operational and related land released from the green belt designation. If a new Administration Block can be built in the green belt as an operational need under permitted development regulations so can a multi storey car park. It is extremely disingenuous to state in its consultation material that '*other options included further multi storey car parking on the North and South sides of the airport, but these would likely result in significant landscape and visual impacts*'. Bristol Airport want the cheap option of low-cost car parking and they adjust the argument to their own benefit regardless of further detrimental impacts to the environment. The land available to the South side is environmentally constrained due to the Greater and Lesser Horseshoe Bat. Low cost car parking is no longer acceptable as it increases urban sprawl through lighting, compromises the openness of the greenbelt and impacts on biodiversity. The continual avoidance of constructing underground or multi storey car parks reveals the argument that the airport is financially unable or unwilling to do so, preferring the cheaper option of low cost parking on open land.

Parking offsite is a major problem for parishes and is growing. There needs to be a coherent off-site car parking strategy, avoiding green belt land, which allows licensed independent operators to compete with Bristol Airport. Bristol Airport should not have a near-monopoly on car parking.

Green infrastructure towards 2040 will be used to mitigate the loss of green belt and fields but it cannot protect and enhance the environment when development is on such a large scale. Green infrastructure can not compensate the land-take of piecemeal development of Bristol Airport with new roads and road improvements and the building of a mass transit through greenbelt. The State of Nature Report 2016 reveals more than 53% of UK species studied have declined and there is little evidence that the rate of loss is slowing down. Further development of green fields on this scale can only accelerate this rate of loss. If any land is to be taken out of green belt, compensation land should be provided.

Question C: The airside platform extension to the airport's aviation infrastructure:

The PCAA believe, and we stress, that the airside platform will have **severe** impacts on parishes and residents surrounding the airport. The fact that the platform would sit above the land, with a varied topography and with a range of heights between 9 and 18 metres is going to allow ground and air noise to travel far greater distances and have highly significant visual impacts. We can not see how this noise can be mitigated by acoustic fences of either 3 or 5 m height and the visual impact be hidden from view.

Note that the planning application of 2011 ignored the impacts of ground noise on residents which can be heard from the airport now on an everyday basis. At 8 mppa there is little respite from noise. The PCAA believe that from 10 mppa there will be no respite from noise every day and in the summer months no respite from noise at night. This means that that between 2000 and 2021, when 10 mppa is expected, the environment for residents will have changed from one in which there was respite from airport noise to none. Obviously, this results in poorer wellbeing and a loss of quality of life. This is also confirmed in the Master Plan 2006 – 2030 from the Bristol Airport: *'interpretation of the noise contours prepared for 9 mppa is that growth beyond to 2030 will be associated with an increase number of people adversely affected by noise'*. This was found to be on houses bordering Felton Common but the emphasis has shifted from development expected on the South side to one that is now on the North side. The PCAA stress again that this development will have severe impacts on parishes and residents to the North and south west of the airport.

Heathrow airport, if the third runway is approved, has made provision for respite through continued runway alteration and the expectation of a six and a half hour ban on scheduled night flights. Current proposals of expansion beyond 10 mppa at Bristol take away any respite from air and ground noise during the day and night as, between 10 mppa and 12 mppa, night time flights will increase due to the change in the planning condition in which both the summer and winter quota have been added together. Currently at Bristol Airport there can be in summer months as many as 22 flights per night which is nearly one every fifteen minutes. Data will be provided on this issue at the time of the planning application. The PCAA demand that respite is given and it is made a condition so that people can plan events around noise free times. Bristol Airport should move towards a night time ban commencing with a night movement restriction per night of 14. These air transport movements should finish before 2 am allowing four hours of uninterrupted sleep. Note that Bristol Airport recognises there is low ambient noise level surrounding the airport as it is situated in a rural location and that the dominant noise at night is aircraft movements. Residents surrounding Bristol Airport should be treated equally with the same rights of those residents at Heathrow. The World Health Organisation recommendations should be adopted for night hours of 23.00 – 07.00 hrs.

Due to a transformative change in the environment from 10 mppa, the PCAA demand that all households are compensated from within the 54 dBL contour for the loss of tranquillity either through the Land Compensation Act or the payment of council tax for each household on an annual basis to North Somerset Council or the applicable

council in Banes. If, for example, a home near the airport was sold in 2021 for £300,000 which, it is agreed by chartered surveyors, would have been worth £350,000 had it not been for the further expansion of the airport to 12 mppa, then the seller has suffered a £50,000 loss. Bristol Airport should make good that loss. Houses are already blighted. Heathrow Airport has committed to pay 125% market value plus taxes and reasonable costs for all those who receive compulsory purchase orders on their property. Bristol Airport should do the same. There has to be an understanding by Bristol Airport that further growth is adversely changing the environment in which many people live surrounding the airport. The airport should be constrained due to its location and its contribution to an increase in carbon emissions.

In summary:

Further expansion makes it impossible to maintain the current quality of life for residents surrounding the airport. It is impossible to reduce noise impacts on residents as there will be a considerable increase in air transport movements leaving no respite during the day and night. We strongly argue that protection for designated sites for nature and conservation will only be weakened with the removal of green belt protection as the airport is very close to many SSSI sites. The rural landscape will disappear as will the tranquillity of the area and dark skies at night. There will be increased congestion on the road network.

Section 2 - Towards 12 million passengers a year:

Again it is disappointing that none of the questions have been answered where we have requested more information on the impacts of development on residents and the environment. Growth towards 12 mppa is part of growth towards 20 mppa in 2040 and the cumulative impacts of this growth should be considered at this stage. Thus, as stated above, compensation is relevant to households from 10 mppa. A more detailed response will be given when information is fully disclosed at the time of the planning application expected autumn 2018. The PCAA believe that this application will be premature. The examination in public for the Joint Spatial Plan will only be commencing, the NSC Local Plan is to be consulted and the Bristol South West Economic Link and the WECA A38 Corridor Study is published sometime next year.

Q2: What comments do you have on our plans for increasing the airport's capacity from ten to twelve mppa?

Surface access:

A sustainable transport hub has to include the wider public and allow for car parking for the wider public to access other areas and should not just be for passengers to and from the airport. The PCAA point out that the reason why growth at Bristol Airport was limited to 10 mppa was due to the road infrastructure. It is the only airport of its size without a rail link and no easy motorway access. Its topography naturally constrains the airport and the PCAA believe that the airport have not adequate funds to provide their fair share of infrastructure improvements and residents quality of life will therefore suffer. Congestion at the A370 entrance to Bristol and the South Bristol Link will only worsen.

Airside development:

The PCAA will object to further increase of aircraft stands beyond those already granted consent to 10 mppa of 33 with an additional one granted under permitted development. 33 aircraft stands will easily allow growth to 12 mppa. At the time of planning application 09/P/1020/OT2 the PCAA pointed out that the aircraft stands granted consent brought passenger numbers above 10 mppa

Car parking:

Please see comments above including those on green infrastructure. It is unacceptable to continue to use green belt land and green fields for low cost car parking. It is unacceptable for Bristol Airport to use the argument *'other options include further multi storey car parking on the northern and southern sides of the airport, but these would likely result in significant landscape and visual impacts'* when under permitted development regulations they are to construct a new administration block which is above 4 m and over 200m³ in the green belt against wishes of the parishes and contrary to the planning consent of 10 mppa. The PCAA demand that underground parking is provided or further multi storey car park are constructed.

Noise:

A full explanation of additional increase in air transport movements is required including general aviation and helicopters.

New aircraft such as the Airbus A320 neo and Boeing 737 MAX are quieter on take off and landing but are still noisy in the mid 70 dB_L plus category. The PCAA want to know how many of these aircrafts will be in situ at Bristol Airport from 10 mppa at 2021 and will they be carrying out each of the four rotations per day? It currently can take up to ten years for a fleet of aircraft to be replaced. If the airport is to expand Bristol Airport has a responsibility to ensure that only the quieter types such as the Airbus 320 neo and Boeing 737 MAX are in use.

Compensation will be necessary beyond 10 mppa and an indication of respite periods. The PCAA demand that respite is given and it is made a condition so that people can plan events around noise free times. Bristol Airport should move towards a night time ban commencing with a night movement restriction per night of 14. These air transport movements should finish before 2 am allowing four hours of uninterrupted sleep.

Note that Bristol Airport recognises there is low ambient noise level surrounding the airport as it is situated in a rural location and that the dominant noise at night is aircraft movements.

Air Quality, Climate Change and Sustainable Growth Strategy:

The PCAA believe that development and activity related to 12 mppa will affect emissions to air including greenhouse gas emissions not *'may'* as suggested in the consultation. It is highly unlikely that public transport to 12 mppa will be

significantly different to that of 10 mppa which is 85% of passengers accessing the airport by car. Air transport movements are obviously going to increase.

The increase in aircraft and vehicle movements has a potential to change vegetation composition due to elevated NO_x deposition impacting on the North Somerset and Mendips SAC and neighbouring SSSI's and affect biodiversity.

An increase in greenhouse emissions is incompatible with Climate Change Act 2008 and recommendations made by the Committee on Climate Change.

Public Safety Zones:

The PCAA request a detailed explanation on how public safety zone areas will be impacted on by all growth scenarios but particularly to 12 mppa and the implications for Felton Common.

Q3: Highways improvements to the A38; public transport access to the airport; improvements considered for 12 mppa:

Any improvements should be put in situ before growth beyond 10 mppa is allowed.

Bristol Airport must fund the improvements to the A38 at Downside Road and West Lane as it is directly related to a private developer and not related to housing and other development.

As stated previously the PCAA believe there will gridlock at the key entrances to Bristol from the A370 and A38 and impacts to local residents of local roads becoming rat runs.

Q4: Comments on how we should manage the effects of our proposals on the environment and local communities?

There is little mitigation shown on how to address the effects of more air and ground noise, increased congestion on all surrounding roads, increased lighting, loss of green belt and green fields. The only way to manage the impacts on communities and the environment is to accept that due to the location of the airport and climate change the airport is constrained and should work within the 10mppa limit. With imagination, destinations can be changed, which they often are, to accommodate new routes for business and leisure opportunities. Ultimately, if expansion occurs, a massive compensation package to residents is required.

Q5: What opportunities are there to enhance the local area through our proposals for 12 mppa?

This is an odd question as impacts are immense on communities and the environment due to transformative change from a rural area to one that is more urbanised, which is noisy, polluting, which destroys the greenbelt and green fields and is even bad for the economy. The mass transit, if delivered, and the dualling of the A38 will add to the transformative change to the area. The PCAA is going to respond in detail on the

economy at the planning application stage. Few improvements can be made to resolve the issue of lack of tranquillity and the ability to sleep at night.

Improvements to consider:

Legalised car parking sites outside the greenbelt should be allowed to make the car parking market competitive allowing communities to receive some of the car parking benefits.

Far more buses should be operated even if these have to be subsidised through villages.

The improvements to the A38 at Downside Road and West Lane must take into account cyclists. Other cycling routes cannot be considered a sustainable option when Brockley Combe is a popular cycle route and used by many.

Litter is a major problem particularly with cars waiting in surrounding lay-bys. Although Bristol Airport has expanded litter collection to streets immediately adjacent to the airport, this facility needs to be extended along the main highway routes and Brockley Combe.

Light spill is a major concern from the airport and the LED system used is particularly harmful to bats as it is white light. Different forms of lighting should be explored which are efficient but less intrusive.

Wildlife and biodiversity will be severely compromised with further expansion and green infrastructure which will be suggested at the next stage can not compensate the development of green fields and greenbelt land.