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Dear Mr Underhay

NORTH SOMERSET COUNCIL DEVELOPMENT & ENVIRONMENT DIRECTORATE	
Referred To	
REC'D	- 4 AUG 2009
Action	
File	Ref No

### RSPB response to Bristol Airport outline planning application 09/P/1020/OT2

Thank you for consulting us about the above application by Bristol Airport Ltd (the applicant).

The RSPB **objects** to this application. Our objection is based on the grounds that the expansion of Bristol Airport would significantly increase emissions of greenhouse gases (GHGs) associated with the development through increased air transport movements. GHG emissions serve to exacerbate climate change. Climate change is the greatest threat facing the planet and without immediate action to reduce GHG emissions there will be devastating consequences for people and national and international biodiversity.

We believe that approving this proposal is contrary to planning policy and Government commitments on climate change. Our comments on the application are set out below. We would be grateful if you would also take into account our letter to you dated 5 December 2006 in response to your consultation on the draft masterplan for the airport.

### Impacts of the proposal

We note that the Environmental Statement does not assess:

- The likely increase in other harmful GHGs,
- The potential radiative forcing effect of increased emissions from CO<sub>2</sub> and non-CO<sub>2</sub> sources.



The application, if approved, would lead to a substantial net increase in associated CO<sub>2</sub> emissions from Bristol Airport through increases in domestic and international air travel. Such increases would only serve to exacerbate climate change.

The Environmental Statement sets out the following figures:

- Domestic and international air travel accounts for the majority of Bristol Airport's current CO<sub>2</sub> emissions (c. 78% in 2007) and will increase to c. 83-85% in 2019.
- By 2019, net associated CO<sub>2</sub> emissions would be more than double 2007 levels with consent (a 125% increase), due largely to a 146% increase in CO<sub>2</sub> emissions from domestic and international flights.
- By 2019, net associated CO<sub>2</sub> emissions from Bristol Airport would be c. 65% greater with consent than without it, due largely to a 69% increase in domestic and international flights over non-consent levels.

Mitigation proposed by the applicant to offset or reduce CO<sub>2</sub> from its on site facilities (c. 3-5% of the total emissions budget 2007-2019) would have a negligible impact in comparison to the increase in CO<sub>2</sub> and other GHGs from these other emission sources. It is noted that the applicant does not accept responsibility for addressing the net increase in associated GHG emissions arising from this application. We believe this is fundamentally wrong and considering the threat to the climate from increasing GHG emissions arising from this proposal cannot be justified.

### **UK's climate change commitments**

The Climate Change Act 2008 requires UK reductions in GHG emissions, against a 1990 baseline, of at least 34% by 2020 and 80% by 2050. The Climate Change Committee has advised government that aviation emissions should be taken into account in the UK's strategy for meeting its long-term climate change goal. It is clear from the Committee's and others' analyses that it will be almost impossible to achieve this goal if aviation emissions are not constrained. We therefore strongly contest statements in the ES suggesting that increased GHG emissions from the aviation sector is compatible with government's overall GHG reduction strategy.

The 2003 Aviation White Paper, supporting expansion of Bristol Airport to 12 million passengers per annum by 2030, was written well before the Government's recent GHG reduction emissions strategy. The RSPB therefore considers that the White Paper is outdated and needs revising from its 'predict and provide' approach to one of demand management.

The Climate Change Committee<sup>1</sup> states that demand management is the only credible means of ensuring that aviation emissions do not rise to unsustainable levels for the climate. Government's failure to adopt significant demand management

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<sup>1</sup> The Climate Change Committee is an independent body established under the Climate Change Act to advise the Government on emissions targets and report to Parliament on progress made in reducing greenhouse gas emissions

measures and to reduce emissions of greenhouse gases from the aviation sector threatens to undermine its whole approach to mitigating climate change.


Although we welcomed moves to bring aviation into the EU Emissions Trading Scheme (ETS), the cap on aviation is not set to decline, so that it will, at best, stabilise emissions rather than reducing them. Moreover, because fuel costs are a relatively small part of overall aviation costs compared to most businesses covered by the EU ETS, aviation will tend to buy emission allowances from other firms at a price which is low to the airlines; which could well result in aviation emissions increasing unabated. Given the high degree of uncertainty over the ETS's effectiveness in moderating emissions impacts from the aviation sector, we do not share the applicant's confidence that the ETS is likely to provide a mechanism to offset the net increase in GHG emissions associated with this application.

### **Planning Policy and climate change**

The applicant states in the ES that the consideration of GHG emissions arising from this application is outside the remit of the planning system. We disagree with this, based on national, regional and local planning land use policy:

- PPS1 states that 'tackling climate change is a key Government priority for the planning system' (pg1). The PPS1 supplement Planning and Climate Change published in December 2007 sets out 'how planning should contribute to reducing emissions and stabilising climate change'.
- Approval of the current application would significantly undermine NSC's target to reduce GHG emissions by 60% by 2050 and seriously undermine its commitment to the Nottingham Declaration which it signed in 2001. Consent would also undermine the general development and transport principles set out in the 2007 NSC Replacement Local Plan which seek 'to contribute to achieving national targets on reduction of greenhouse gases, reduce noise and improve air quality'.
- Consent for the application would also negatively impact the South West region's contribution to climate change mitigation by undermining the commitment set out in policy SD2 Climate Change in the April 2006 Regional Spatial Strategy to reduce greenhouse gas emissions at least in line with current national targets, ie by 30% by 2026 (compared to 1990 levels). RSS policy T/12 Bristol Airport, whilst supporting further development, also requires that environmental impacts such as emissions are minimised. This policy does not differentiate between emissions generated by on site facilities and wider associated emissions arising from increased air travel.

In conclusion, we believe that allowing this level of expansion of Bristol Airport would, together with similar schemes elsewhere in the UK, lead to an unacceptable growth in air transport GHG emissions. The RSPB therefore objects to the application due to the net contribution that the proposal would make to climate change through



associated GHG emissions and the lack of effective proposals to address this either locally or within the national climate change framework.

On this basis, we believe that there is sufficient basis for NSC to refuse consent for this application, and we urge you to do so.

Yours sincerely



Richard Archer  
RSPB Conservation Officer South West England