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Our Ref
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Date 18 August 2009

Dear Richard,

**Objection to Bristol International Airport Planning Application No:
09/P/1020/OT2**

The City Council welcomes the opportunity to comment on Bristol International Airport's (BIA) proposals for development.

The Council provided comments to North Somerset Council on the Final Master Plan in December 2006 and wrote in April 2009 to set out the Council's formal position on BIA's proposals for expansion as agreed at a Full Council meeting on 31 March 2009.

The Council submitted comments to BIA on the pre application consultation which maintained the position set out in the response to the 2006 Master Plan (The Council's 2006 letter concluded that it could not support the Master Plan until significant changes were made to ensure that the proposals have a lower overall impact and incorporate stronger mitigation measures). It was considered that the consultation documents on which the pre application consultation was based provided only a limited amount of fresh information on impacts and mitigation. Therefore, whilst recognising the potential role of the airport in terms of economic growth, the Council's position on the development proposals remained substantially unchanged.

In relation to the application now submitted to North Somerset Council, it is considered that BIA has failed to adequately address the issues of concern raised at earlier stages. In the event that North Somerset Council is minded to approve the development, then the mitigation set out below should be secured.

Noise

The main noise impact for Bristol results from aircraft overflying the urban area, and naturally these impacts would have greater significance when they occur at night. Volume 9 (Noise) of the Environmental Statement (ES) advises that the increased number of flights facilitated by the proposed developments would not result in any significant increase in night flights, as no change to the night noise quota system is proposed. However this document does indicate that there will be a significant increase in flights during the shoulder periods of

06.00-07.00 and 23.00-23.30. This will inevitably increase the number of flights over the city at these times which are more noise-sensitive than during the day. It is recommended that BIA should endeavour to minimise this increase.

In addition the ES advises that flights by commercial traffic will go from 60,000 to 85,000 per year at 10mppa. This equates to an increase of almost 42%. It is assumed that the number of flights overflying the city will also increase by this proportion, which will mean a considerable rise in discrete noisy events over the city.

The ES does not consider or address any increased disturbance to Bristol residents due to overflying the urban area, other than suggesting that continuous descent approaches take aircraft on a higher approach path, and reduce engine power during the descent. Anecdotal information to the City Council suggests that since the introduction of the airspace changes in 2006 there has been an increase in the numbers of aircraft at lower heights over the city, which appears contrary to this advice. BIA have set targets to achieve 95% of arrivals by continuous descent approaches and this target together with the use of approach paths at the highest possible altitude over the city should be formally acknowledged within the context of any consent, if granted. The current wording in 4.1 of the draft S106 agreement "Part 2 Obligations relating to noise" in the Planning Supporting Statement is too vague and simply states this should be achieved "where possible". It should read 95% by 2019 as set out in section 5.4 (page 78) of the Planning Supporting Statement. BIA should also be required to adjust routes of continuous descent approaches to spread the noise burden more widely and avoid routinely overflying the same parts of the urban area, especially at the more noise sensitive times.

Air Quality

The air quality section of the ES has been reviewed, however, the study area excludes areas within Bristol so it is not possible to directly assess the impact of the development on air quality within the city. Examination of the traffic data within the transport assessment shows that there will be a slight increase in traffic on most routes, assuming that the targets for modal shift are met. It is likely therefore, that the A38 at the Parson Street gyratory (within the Air Quality Management Area) will experience a small increase in traffic flows, and hence emissions as a result of the expansion. An increase of 11% to the traffic flows on Bedminster Road (B3122) is predicted, although this is identified as a spurious modelling result. Combined with predicted background increases in traffic flows, the development is likely to mean that air quality continues to be a problem around the Parson Street gyratory for the foreseeable future.

The airport expansion is likely to work against the City Council's aspirations for cleaner air in the city, especially around the main road leading to the airport (A38), although compared to the effect of local traffic and predicted traffic growth, the effect of the expansion will be small.

Climate Change

From consideration of the application documentation it appears that there is insufficient evidence and guarantees for the implementation of the proposal for at least 15% of the predicted additional energy requirements to come from on site renewable sources.

It is considered that any mitigation measures achieved through sustainable design or the use of sustainable energy onsite will have an insignificant impact in relation to the total carbon emissions from the development. While sustainable energy measures have been included to comply with the North Somerset requirement of 15% on site renewable energy generation, there is little supporting evidence of how feasible these measures are. There is also insufficient evidence on how the design of the development responds to current climate change impact predictions for the south west, particularly in relation to rising temperatures, increased precipitation and extreme weather events.

The proposed expansion will result in a significant increase in CO2 emissions and as the proposed mitigation measures focus just on buildings and public transport improvements they are considered to be insufficient. The proposed development will significantly increase the West of England carbon emissions and make it difficult to meet our existing reduction targets (which exclude the aviation emissions), particularly due to increases in surface transport CO2 emissions.

In January 2009 the UK Government announced a target to reduce UK aviation carbon dioxide emissions to below 2005 levels by 2050, despite forecast growth in passenger demand. The Committee on Climate Change has been asked to advise on this by December 2009. It is unclear how the BIA proposal is consistent with this target.

Economy

In relation to the economic benefit to local residents through employment opportunities inadequate provision is made to improve accessibility for local residents to related employment. It is suggested that the S106 be modified to include direct measures to improve transport options for residents of South Bristol's most deprived wards so that they can access job opportunities at Bristol International Airport more easily. Whilst the Bristol International Flyer provides a means for Bristol residents of accessing the airport, it skirts the South Western edge of the city and may not be easily accessible from areas such as Filwood, Knowle, Hartcliffe and Whitchurch Park. Further consideration should be given to this.

Transport

Public Transport

It is considered that a 15% modal share of passengers using public transport at 10mppa (compared with 8% currently) is appropriate, and the City Council broadly supports the strategy of continuing to concentrate on and develop the Bristol Flyer service as the main public transport option for travel between

Bristol and BIA. The suggested increase in Flyer services to 8 services per hour will offer an attractive public transport option, and greater opportunity to interchange with other bus services and the rail network. However, the City Council would urge BIA to regularly review options for wider Flyer service routes as the future growth in patronage may present opportunities to serve other parts of the city beyond the core route. The cost of using the Flyer is prohibitive to some potential users however and this could act as a barrier to achieving a higher modal share of passengers. Investigating and promoting through-ticket options and other marketing initiatives are likely to be a key tool in increasing patronage on this service.

A key transport improvement that the City Council considers would considerably increase modal share of airport passengers using public transport is an extension of the proposed Bus Rapid Transit network to serve the airport. Therefore, it is suggested that a significant contribution towards the cost of this extension should be sought.

Traffic

It is noted that the consultants undertaking the Transport Assessment (TA) have undertaken trip generation modelling for airport traffic using the North Somerset Traffic Model. The model has calculated the number of trips to the airport based on modal share, vehicle occupancy and flight schedules, which have been applied to existing traffic count data. The 'likely-case' scenario tested depends on a public transport modal share of 15% and 10mppa in 2021. The South West Bristol Urban Extension and the South Bristol Link proposals have not been included in the modelling, therefore, it is difficult to make an assumption on how these could affect traffic to the airport. South Bristol Link would be likely to reduce airport traffic on Bristol's network in the vicinity of Parson Street gyratory and surrounding roads. However, the network could become more sensitive to increases in airport traffic if background traffic levels increase further due to the South West Bristol Urban Extension. Therefore, the City Council welcomes the suggested contribution to the South Bristol Link proposals (please see further text in the last paragraph of the transport section on mitigation below).

Airport peak periods tend to differ from peak periods on the surrounding highway network. However, as traffic increases, peaks tend to spread, so airport traffic will have a greater impact. Morning peak hour trips to the airport appear to reduce between 7.3mppa and 10mppa due to the flight schedule changing, but overall the TA suggests an increase from 18,000 two-way movements per day at 6mppa to 25,000 two-way movements at 10mppa. The TA does not model Bristol junctions in detail as the additional traffic at these links is not considered to be significant. Taking the 'no development' scenario, A38 northbound traffic from Downside Road (i.e. all trips towards Bristol) increases by 10%. Using this scenario, it could be assumed that a relatively small increase proportionately in traffic would be expected at key junctions for between Bristol and the Airport (Cumberland Basin and Parson Street).

Construction traffic is predicted to be in the region of 40 deliveries per day, which is unlikely to have a significant impact on the local highway, though

careful timing and routing of construction traffic to avoid peak periods should be sought.

The City Council supports the contributions set out in the S106 Agreement for highway mitigation measures and public transport improvements. The two major schemes (South Bristol Link and Bus Rapid Transit) listed in the agreement aim to reduce traffic and improve access to South Bristol so will also support the Airport expansion proposals.

Consideration should be given as to whether any of the £1m contribution for highway mitigation measures on the A38 should be used for minor improvements to junctions along the main Airport routes within Bristol. It should also be considered that if the South Bristol Link proposals do not go ahead, additional funding for other highway improvements would be required to mitigate the effects of increased airport traffic.

Draft S106 Agreement

It is noted that Bristol City Council is not listed within the list of organisations with representatives on the BIA Transport Forum set out in para 1.5 on page 3 of the draft agreement. This appears to be an omission as the City Council is still an active member of the Forum. Para 1.5 of the draft S106 agreement should be amended to reflect this.

It is considered that the text within the draft S106 agreement could generally be tightened up. Throughout the draft agreement text such as “use reasonable endeavours” could be replaced by “require”. An example being that text in para 2 of the section on Public Transport (page 18) reads “to provide the Council with”, this could be strengthened to read “to submit to and receive written approval from the Council”.

With regards to the interest and indexation section (section 6), it is recommended that all sums should be index linked from the date of committee resolution to preserve their value.

A package of mitigation measures to address the climate change impacts relating to the high levels of carbon emissions from surface transport is needed.

Conclusion

The information available to support the planning application suggests that there has been little change to meet the Council's concerns set out in the response to the Final Master Plan. The Council's response to this document concluded that it could not support the Master Plan until significant changes were made to ensure that the proposals have a lower overall impact and incorporate stronger mitigation measures. Past concerns that the environmental impacts could be substantial, and possibly unacceptable remain. Recent government and local authority commitments to more challenging carbon reduction targets adds weight to concerns about impacts on climate change. Consequently, the Council's position on the development proposals remains substantially unchanged.