

Dundry Parish Council

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Response to 20/P/2896/APPCON Environmental Statement Addendum

Dear Sirs,

After examining this ES Addendum, Dundry Parish Council still upholds its strong objection to planning application 18/P/5118/OUT as outlined in our submission on 25th January 2019 and expresses its hope and expectation that the Airport's appeal against the planning refusal by North Somerset Council on 19th March 2020 will be rejected.

In particular, we would like to comment on the following statements in the ES Addendum:

2. Legislative and Policy Updates

"...on 7 April 2020, the four councils wrote to the Inspectors 11 to confirm the withdrawal of the JSP from examination. In consequence, the JSP no longer has any material weight in decisions concerning development at Bristol Airport;..."

"NSC has commenced preparation of a new Local Plan for the period 2023 to 2038. [...] However, detailed policy proposals have not yet been set out and the new Local Plan will not be adopted at the time the appeal is determined. In consequence, the emerging new Local Plan does not materially affect the conclusions of the original ES."

The absence of local plans should not be interpreted as "one less obstacle" in the application process. While the JSP was found to be flawed and the NSC local plan will take some time to be prepared, their fundamental messages are still valid and will be re-affirmed in good time.

3. Scheme Need and Alternatives

“Chapter 3 of the original ES established that the need for the Proposed Development is influenced by the following:

- demand factors demonstrated by forecast passenger growth and aircraft (traffic) movements;*
- the economic importance of Bristol Airport and the wider aviation sector to the local and regional economy; and*
- policy support for airport growth and making the best use of existing airport capacity.”*

With Covid-19, Brexit and changing passenger attitudes due to climate change all coming together at the same time, it can no longer be assumed that the “demonstrated” passenger forecasts are correct or will ever be met.

Add to this the fact that the above developments contribute to economic difficulties faced by many airlines with some (such as EasyJet?) possibly even going out of business and it is clear that it would be irresponsible for Bristol Airport to make investments that may never pay for themselves, as much as it would be irresponsible for the regulator to give the airport a blanket permission to do so.

The economic importance of Bristol airport to the local and regional economy must also be called into question. This is mainly a holiday airport, as is evident from their flight schedule, and holiday travellers do not tend to encourage much business activity or generate much extra income. The little they and the increased air traffic movements do contribute to our local area must be seen in the context of huge negative impacts that this airport has in terms of traffic congestion, noise pollution, air quality etc.

5. Traffic and Transport

From our point of view, this is the biggest obstacle to any sensible expansion of the airport.

“Changes in traffic flows experienced on the highway as a result of the Proposed Development were predicted to be small, with less than 10% increases in the number of total daily vehicle and less than 2% increases in Heavy Good Vehicles (HGVs).”

This statement does not make any sense. An increase in passenger numbers from 10 mppa to 12 mppa represents a 20% increase. It is not conceivable that these extra passengers will find other ways to get to the airport, because there are none (apart from the Airport Flyer bus and some vague ideas about a future light rail system). The logical conclusion is that we are likely to see an increase in road traffic of close to 20%. All other conclusions in this chapter are based on this wrong assumption and seem to make the effects sound negligible, which they are not.

6. Noise and Vibration

“...the number of people highly sleep disturbed will be the same as 2017 under the 10 mppa 2024 scenario. There will be a slight increase in the number of people highly sleep disturbed in the 12 mppa 2030 scenario compared to the 2017 baseline...”

We find it disturbing that sleep deprivation is taken for granted or seen as collateral damage. In our experience, quieter airplanes do not make much of a difference. They may generate lower noise readings from a technical point of view, but they are still noticeable as flying airplanes, i.e. generate a disturbance. It seems futile to argue how many fewer people perceive them as a disturbance due to their reduced noise.

7. Air Quality

“The original ES concluded that in view of the ‘moderate’ impacts predicted at a small number of receptors, the overall significance was moderate adverse and significant. Due to the much lower impacts now being predicted, it is considered that the overall significance is not significant.”

This seems to be another example where the ES Addendum tries to backtrack on the original ES and to talk down the impacts of the proposed development.

Even taking into account more efficient technology in aircraft and road traffic, the development still poses an increase in movements and we are doubtful whether this can be offset by technology at all.

8. Socio-economics

“● Tourism Visits and Expenditure Data – updated information on tourism expenditure and visits from VisitBritain is included in the estimates;”

It is interesting this aspect is mentioned here. As commented above, Bristol Airport is mainly a holiday hub, marketing its flight destinations in groups such as “Sun and Beach”, “Winter sports” etc. This already reflects the imbalance: How many tourists from Gran Canaria or Innsbruck are attracted to the South West of England and spend their money here?

“Across the wider South West England and South Wales region, the total direct, indirect or induced and catalytic employment effects arising from Bristol Airport in 2030 with 12 mppa is estimated at £2.34 billion GVA and some 30,280 jobs (See Table 8.8). This amounts to an increase of £310 million to the regional economy, along with some 4,000 new jobs...”

We would need to examine more detailed data to verify this. But what is generally apparent is that the ES tries to talk down any negative effects of the proposed development and to talk up any positive effects. This is why we see such optimistic predictions with a degree of scepticism.

9. Human Health

“Table 9.1 Summary of significance of human health effects” (page 141)

It is notable that, apart from Economic Effects, the majority of entries in this table states “negligible, up to minor adverse” effects on human health. Even with consistent attempts at talking down negative impacts of the proposed development, their existence is not denied here.

10. Carbon & Other GHGs (climate change)

A lot of data in this chapter revolves around carbon offsetting to achieve net zero. But, certainly, the easiest way to combat the effects of aviation on climate change would be to reduce the number of flight movements and passengers, not to increase them, perhaps even by actively discouraging passengers from flying. - This, however, would not be in the economic interest of the airport and was therefore not considered.

11. Cumulative Effects Assessment

“Until MSCP 2 and the associated internal road layout is constructed (as per the extant 10 mppa consent), traffic accessing the PTI and the drop-off zone would utilise the existing internal roads...”

It is notable that this car park was approved in 2011 but still has not been constructed. Instead, the Airport continues to seek the removal of the seasonal restriction on the existing Silver Zone Car Park Phase 1 to allow for year-round use, with installation of permanent lighting etc.

We strongly object to this plan and insist that all other options (especially those already approved in the planning process) are exhausted before giving up valuable Green Belt land. Until Bristol Airport can complete the work already applied for and have it approved, no other extension to parking should even be considered.

Very best regards,



Holger Laux
Chairman
Dundry Parish Council