Yatton Parish Council Comments on 18/P/5118/OUT: Bristol Airport Expansion

January 2019

Yatton Parish Council previously commented on this application in January 2019 to the following effect:

* The fundamental stipulation of the National Planning Policy Framework is that all development should be sustainable. The Parish Council consider that an increase to 12 million passengers per annum with the associated noise, pollution and increased traffic accessing the airport without significant infrastructure links is contrary to this. The proposed improvements to the A38 within this application do not adequately address these issues and the public transport proposals are deemed to be aspirations that have no consequence or penalty should they not be achieved. This has already been demonstrated historically as the targets for public transport within the last master plan for 10 million passengers have still not been reached.
* In order to facilitate a passenger figure of 12 million, major road improvements would be required to create direct links from the M5(J20) and M5 (J21) with the capacity to accommodate the volume of traffic this number of passengers would generate and to prevent increased traffic volume through the surrounding villages e.g. Yatton and Congresbury. A rail connection from Temple Meads and Bristol Parkway to the airport would be a further major infrastructure improvement the Parish Council supported.
* The proposals within this application working towards the 12 million passengers should not commence until the infrastructure improvements are in place. Bristol Airport is becoming one of the largest regional airports but is notable for its lack of adequate direct links to any major motorway or rail link by comparison to other regional airports.
* The lifting of seasonal restrictions on night flights was not supported by the Parish Council.
* The Parish Council considered that the passenger number should remain capped at 10 million.

May 2019

The Airport subsequently provided more information, prompting Yatton Parish Council to make additional comments on the application in May 2019, as follows:

**Transport**

* It is important to note that the figures given in the Transport Assessment relate to modelled changes in journeys if the Airport expands from 10 million passengers per annum (mppa) to 12mppa. The current usage is 8.6mppa, so there will already be a roughly 16% increase in journeys compared with the current situation before the new figures are included. The increase from 10mppa to 12mppa will result in even more vehicle movements through Yatton (especially during the evening peak), with concomitant and unacceptable adverse effects on safety, air quality, climate change, noise, and congestion.
* One of the suggested “mitigation” measures – improved on-site parking provision – will actually exacerbate matters because it will encourage private car use.
* We would like to observe in passing that there are calculated to be 87 movements during the morning peak time of 07:00 to 10:00, equating to an average of 29 movements/hour (Transport Analysis, Table 4.1). Cherry-picking the least busy of those three hours and using its figure of 18 movements/hour is therefore misleading, and has the effect of underplaying the impact on local communities.

**Environment**

* We note with dismay that the adverse economic effects of contributing to climate change have not been included in the economic analyses, thus painting an unrealistically optimistic picture (Socio-Economic Analysis, page 14). If this application is to be genuinely sustainable, as required by the National Planning Policy Framework, it will need to show how the adverse climate effects of an increase of 20% in passenger journeys will be neutralised.
* The climate change mitigation measures deal only with the carbon footprint of constructing and maintaining the airport in such a way that it can support 12 million passenger journeys per year. This footprint is utterly dwarfed by the increased emissions from the extra flights that will be required. In order to be sustainable, in line with the National Planning Policy Framework, the Airport will need to show how it will mitigate these effects too.
* The noise contour maps in the Noise Analysis (Appendix 7D) indicate that there will be a particularly marked increase in the extent of night-time noise in Yatton. Residents are already very concerned about aircraft noise and we do not consider it acceptable to add to this already much-resented burden. If the application does go ahead, we would expect all properties in the parish of Yatton that fall within any part of the 70dB and above noise contour, however briefly, during any part of the year and at any time of the day or night, to be eligible for grants for the purchase and installation of sound insulation and double-glazing as necessary and permitted.
* We would like to observe in passing that the noise contour maps in the Noise Analysis show a small decrease in summer noise over Yatton when passenger numbers increase from the current 8.6 million per year to 10 million per year or 12 million per year, using the sixteen hour equivalent continuous A-weighted sound pressure level. This is presumably an error, because the eight hour and annual contour maps show the expected increase. Furthermore, the annual contour maps suggest that 10 million passenger journeys per year will generate less noise than 12 million. This suggests that the noise contour mapping is in considerable error.

October 2019

Yet more information was made available by the Airport in October 2019. Yatton Parish Council would like to comment on this new information as follows: please note that all our previous comments still stand.

**Environment**

* We consider that the Airport’s response to criticisms of its carbon policy amounts to pointing out that since definitive statutory guidelines have not yet been issued, it cannot be in breach of them. This is frivolous. It contravenes the spirit of climate emergency motions passed by Yatton Parish Council and North Somerset Council, and the stated aims of central government, which all require net carbon neutrality to be set as an urgent goal. This can only be achieved if large net carbon emitters reduce their emissions; if they all increase them, even by a small amount, then the situation will be lost.
* We also consider that the Airport’s dismissal of adding 0.28% of emissions to the Committee on Climate Change’s recommendation as “not significant” to be arbitrary: the most recent annual accounts make some play of the Airport’s donation of £156K to local charitable causes. This represents 0.14% of annual turnover. It is hard to see how that figure can be portrayed as a significant matter for the local area when a proportion twice as high, in terms of carbon emissions, is not.

**Noise**

* We presume that the reduction in noise predicted to occur with an increase in passenger numbers from 10 million passengers per annum (mppa) to 12mppa is a consequence of improved aircraft engine design. We note that the Civil Aviation Authority’s 2014 report “Managing Aviation Noise” suggests that “noise improvements may not be as significant as with previous generations of aircraft”, which casts some doubt on this prospect. However, even if such technical advances are realised, then the already considerable noise nuisance would still be more usefully mitigated by holding maximum passenger numbers at their current levels or below. Furthermore, our own limited surveys suggest that the actual peak aircraft noise levels experienced within our parish are far in excess of the average levels shown in the Airport’s maps and diagrams, easily reaching 80dBA.
* It is the combination of peak loudness and frequency that troubles people, not levels averaged over a period of time which includes interludes when planes are not passing nearby. The frequency will certainly increase if passenger numbers rise, and it is not definite that aircraft engine loudness would necessarily reduce through future technical advances. We therefore consider that aircraft noise, already a very significant problem for many residents of our parish, would be likely to increase even more if passenger numbers rise. In support of this we note, with considerable dismay and with great sympathy for residents of our neighbouring parishes, that aircraft noise complaints have more than doubled over the last three years. The casual suggestion in the Airport’s response that this is partly a consequence of people simply being more likely to complain about things these days is, in our opinion, patronising and irresponsible.