

## **PCAA Position Statements for Core Strategy Examination**

The Parish Councils Airport Association is a voluntary organisation that represents 22 Parishes surrounding Bristol Airport in the Districts of North Somerset and Bath and North East Somerset. Our main objective is to minimise the impacts of airport activities on Parishes and the local and global environment. The PCAA responds to consultations at local, regional and national level. The PCAA takes the collective view of its Parishes and each Parish is able to submit its own response to consultations and issues arising from the aviation sector.

This present Response (below) was drafted by a working group incorporating policies which have gained strong, even unanimous support from PCAA members over many years. The draft was circulated to member parishes for comment. This does not mean that all parishes endorse every letter of the Response, indeed some will add emphasis to problems which particularly concern them, some may disagree with specific details; all are free to express their own opinions. Nevertheless the Response broadly reflects the views of some 22 local councils, each responsive to the views of many thousands of electors.

The Response is informed by policies of the PCAA which have gained strong, even unanimous support over many years, in particular to enable the community to enjoy the benefits of the airport while:

1. trying to prevent an increase in noise annoyance by day and night; trying to reduce noise impacts ;
2. containing, preferable reducing, the impact of airports on local infrastructure – road congestion;
3. developing aviation in such a way as is consistent with government greenhouse emission targets;

Since submitting the PCAA representation in February 2011 to the Core Strategy the Department for Transport has published its Scoping Document: *Developing a sustainable framework for UK aviation March 2011*. This document recognises that the 2003 Air Transport White Paper is out of date and no longer fit for purpose. The White Paper failed to recognise the importance of addressing climate change and the impacts of aviation on the local environment. The Department for Transport issued a further two reports in late August. These were the new UK aviation forecasts 2011 and the Government response to the Committee on Climate Change's Aviation report. The PCAA requests that these reports are given substantial weight throughout the examination of the Core Strategy.

a. *The degree of weight to be accorded respectively to the extant RPG10 and the draft Regional Strategy [RS] and the evidence that underpinned the dRS with regard to the overall spatial strategy of the CS its and broad locations for development*

a.) The draft Regional Strategy (dRS) and the Core Strategy (CS) both propose development at Bristol Airport. The dRS airport policy TR9 supported development at Bristol Airport ignoring its own Strategic Sustainability Assessment (SSA). The SSA highlights the fact that air travel is the most unsustainable form of travel and that any increase in air travel is undesirable. Relevant highlights from the SSA are:-

- Air travel is the most unsustainable mode of transport.
- Air travel will result in an increase in greenhouse gas emissions in the regions.
- Air travel will increase the vulnerability of the economy as a result of climate change.
- Negative impacts on landscape character, especially where development is likely to occur.
- An increase in light, noise and air pollution from development and traffic.
- The expansion proposed at BA is likely to have significant negative impacts both through airport operations (flights, noise footprint, etc.) and through airport access issues (road transport, green field development, car parking etc). Any emphasis on providing new links between the motorways and the airport will encourage greater car/freight movement and, therefore, negative related environmental impacts.

*‘The RSS should explicitly resist airport expansion, because it would undermine all the efforts within other sections of the RSS to reduce greenhouse gas emissions.’ (SSA, s.11.20)*

*and*

The RSS should “reverse the support given to airport and related development” (SSA, s.19.18).

The draft RS failed to identify alternatives to policy TR9 which anticipated airport expansion in the region. This could have been for instance High Speed Rail links. The need to evaluate alternatives was shown in the case for the RSS for East of England.

It is worth noting that the previous that the draft RS was written in the light of the Air Transport White Paper 2003 (ATWP).

**The PCAA believe that no weight should be given to dRS.**

BA expansion plans conflict with the sustainability aims in the Core Strategy which, as an Association, we highly commend. Indeed, any further growth at the airport would cancel out most of the potential gains from implementing the policies outlined in Chapter 3: Spatial Policies particularly living with environmental limits.

#### **b.) Green Belt implications of the Core Strategy compared the draft RS**

The PCAA supports policy CS6 as it identifies that there will be no change to the Green Belt within North Somerset within the plan period and recommend no changes. CS6 point 3.97 stated *'Further Green Belt amendment would be premature in advance of exceptional circumstances being demonstrated through evidence regarding future expansion and its land use implications'*.

The Panel at the RSS Examination in Public, in their report, proposed that land around the airport should be removed from the Green Belt on the basis that the 2003 Air Transport White Paper (ATWP) provides sufficient justification. However, the ATWP is now out of date and being replaced by a new aviation policy which is being based on two recent reports. These reports are UK Aviation Forecasts published by the Department for Transport August 2011 and the Government's response to the Committee on Climate Change on reducing CO2. These reports indicate that Bristol Airport will have reduced passenger numbers in the plan period of up to 9 mppa by 2030, thus no amendment to Green Belt is required. (see section provision for Bristol Airport).

Bristol Airport a private developer, will argue very strongly that the relaxation of the specific Green Belt rules such as the *'provision of local transport infrastructure'* (para 145 draft NPPF) should allow further car parking. The PCAA has no wish to see Green Belt being used for car parking by either Bristol Airport or private off-site car parking firms. The PCAA has previously supported NSC policy T/12 on off-site car parking. The PCAA took the decision that if Bristol Airport is allowed to expand further on to Green Belt land, we would consider this unacceptable as it would put the airport in a near monopoly position. The decision was taken at the meeting held on 22 March 2011 and recorded in the minutes. BA has no superior right to use green belt land. (3.293).

The generous allowance given to car parking on Green Belt land at Bristol Airport will do little to encourage use of public transport. Bristol Airport will have 2000 spaces per mppa compared with Stansted (1,700), Manchester (622), Heathrow (511) and much lower figures at overseas airports, including Hong Kong (146).

If North Somerset Council wishes to turn down car parking at the airport, the authority will have to demonstrate significant adverse impacts because of the presumption in favour of sustainable development. These are outlined below:

Implications of releasing Green Belt:

- Green Belt will be used for car parking; it will undermine moves towards making the airport more sustainable through increased use of public transport. Greenhouse gases from increased journeys to and from the airport will rise. Optimistic forecasts indicated that public transport to the airport will only reach 15% by 2020, still leaving 85% of passengers to travel to BA by car at 10 mppa. (ref BIA planning application).
- Negative impacts on landscape character - Landscape character will be lost from the Mendip Hills, an Area of Outstanding Natural Beauty, through loss of open views and the Area's inherent tranquillity.

The PCAA believes that the coalition government has widely publicised, in many statements, that the Green Belt would be maintained.

Policy CS23 has combined paragraphs 3.291 and 3.292, the PCAA suggest the following words to replace point 3.292.

**From:** *'As well as taking account of the wide range of environmental issues including climate change, the Core Strategy emphasises the importance of assessing the local impacts, particularly in relation to surrounding communities and surface access strategies.'*

**To:** *'Proposals for the development of Bristol Airport will be required to be consistent with the principles of Sustainable Development and to demonstrate the satisfactory resolution of environmental issues, including (i) a reduction of greenhouse gas emissions associated with both aircraft in flight and ground transport associated with the development; (ii) the impact of growth on surrounding communities and (iii) surface access infrastructure.'*