

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 This document recognises that the 2003 Air Transport White Paper is out of date and no longer fit for purpose.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.

i. Appropriateness of Provisions for Bristol Airport

It is worth noting that the previous Local Plan was policy T/12 was written in the light of the Air Transport White Paper 2003 (ATWP) and supports development at Bristol Airport but never quantified passenger numbers. The emerging RSS had not been progressed. No policy was in place that had been formulated in accordance with the requirements of the SEA Directive on air port expansion at Bristol Airport. The local plan was parasitic on the ATWP. None of the policy framework had been formulated in the light of the Climate Change Act 2008 or the Planning Act 2008.

In respect to the *commentary* on policy CS23, North Somerset Council has proposed an additional sentence added at the end of paragraph 3.290

'The Government has indicated its intention to replace the 2003 White Paper, placing additional weight on climate change and the impact of aviation on local communities, whilst still enabling growth'

The PCAA notes the moves to constrain demand in current government thinking (see our Position Statement on climate change provisions above, section 3 and its Appendix) and argues that there should be no further growth allowed at Bristol Airport throughout the duration of the Core Strategy part of the Local Development Framework and the words '*whilst still enabling growth*' should be removed. This strategy governs planning policies up to 2026. A planning decision was granted to Bristol Airport in February 2011 to take passenger numbers to 10 million passengers per annum (mppa). This number of passengers will allow the Airport to grow in accordance with forecasts shown in the UK Aviation Forecasts published by the Department for Transport August 2011 and complies with the central forecasts shown in the Government's response to the Committee on Climate Change report on reducing CO2 from UK aviation by 2050.

UK Aviation Forecasts 2011

Page 149, in Table G2 there are forecast numbers per airport. Bristol Airport shows:

2010 : 6 million passengers (it was in fact 5.7)
2020 : 6
2030 : 9
2040 : 12
2050 : 12

<http://assets.dft.gov.uk/publications/uk-aviation-forecasts-2011/uk-aviation-forecasts.pdf>

thus showing no actual expansion by 2020 and not exceeding 10 mppa granted in the

planning decision until into the 2030's. This is the constrained forecast.

In the more detailed Table G.3 on P150, the low estimate for 2030 is 7 million and the high is 9m.

These tables show that there is no reason to grant further growth in the current strategy.

If the words '*whilst still enabling growth*' remain, it will be impossible for North Somerset Council to turn down a future Bristol Airport planning application under the new guideline of the draft National Planning Policy Framework (NPPF) with a presumption in favour of sustainable development. Our belief is that 'sustainable development' will be viewed in economic terms such as sustained growth rather than environmental sustainability. Once these words are accepted into the Local Plan, the Core Strategy, no amount of objections to an airport planning application can over turn it. The PCAA believe that this contrary to localism. It certainly is unfair and undemocratic.

The PCAA suggest an amendment to phrasing of the commentary on CS23 paragraph 3.290 to give clear guidance to the strategy.

From: *'The Government has indicated its intention to replace the 2003 White Paper, placing additional weight on climate change and the impact of aviation on local communities, **whilst still enabling growth**'*

To: *'A new sustainable framework for UK aviation is being developed placing additional weight on climate change and the impact on local communities; growth of no more than 10 mppa is expected within the plan period and up to 2030'*

Our proposal for amendment of CS23 itself was given above. For convenience we repeat it here:

CS23: Bristol Airport

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.

Note: technological advances in aircraft design, fuel efficiencies and second generation bio fuels are not expected in the strategy time period. Ref: Committee on Climate Change Aviation Report 2009

Note: Bristol Airport has always given forecasts which are higher than the forecasts of the Department of Transport. Aviation Economics was commissioned in 2009 to update

forecasts for Bristol Airport. They anticipated that growth at Bristol will generate around 10 mppa at 2019. Average traffic growth for the period is to be 4.5% per annum to 2016. From 2016 average traffic growth falls to 3.3% per annum. (ref BA Planning Supporting Statement P26 and 27 point 2.5 and 2.5.1). The PCAA requests that the Dft Aviation Forecasts August 2011 report is used as it is more up to date. Airport operators exceed the forecasts of the Dft for several reasons; one is that the forecasts are prepared for business purposes which, by their very nature, tend towards a more positive view of their business prospects in order to get an application granted, through overstating benefits. Bristol Airport's major passenger sector is short haul leisure passengers rather than passengers from the business sector. The Tym Economic Impact Report gave figures from CAA surveys which showed reductions in business travel from 19.8 % in 2003 to 13.34 % in 2008. The report continues that the business sector may further reduce to about 9.6% by 2019/2020.

The catchment area for Bristol Airport is less than a two-hour travel radius with nearly 50% of passengers having an origin within the former County of Avon . Increasing passenger numbers is essentially a matter of enticing passengers away from Cardiff and Exeter airports. The Airport will argue that new routes and improved frequency of service will achieve this and will reduce the need for passengers to travel to airports outside the region. Bristol Airport states that this will reduce the need for long distance journeys, primarily by road, thus saving carbon emissions. This is known as 'leakage' and is misguided. Offering more flights from Bristol Airport (with a rationale of reducing leakage and saving carbon emissions) will actually induce more people to fly and to fly more frequently, resulting in higher emissions. This can be seen in the EKOS report commissioned by the South West Regional Development Agency 'Informing Sustainable Aviation Policy for the SouthWest'. The PCAA believes that no evidence on this point has been gathered by North Somerset Council. (3.290). The PCAA suggests a detailed study should be undertaken on leakage at Bristol Airport and its consequences.

North Somerset Council has accepted blindly all forecasts from Bristol airport in granting their planning permission to 10 mppa by 2019/20. The UK Aviation Forecasts August 2011 and the Government's response to the Committee on Climate Change suggest 9 mppa by 2030; a lower figure in the report of 7 mppa fits with 37.5 Mt CO₂.

The Government's response to the Committee on Climate Change on reducing CO₂ from UK aviation by 2050 <http://assets.dft.gov.uk/publications/response-ccc-report/ccc-response.pdf>

The Government's response has put forward a scenario that works towards keeping aviation emission levels at 49 MtCO₂ by 2050. A decision by the Government will be made next year on whether or not to reverse the decision of the Heathrow ruling in which emissions levels would be kept at the lower figure of 37.5 Mt CO₂ rather than the higher figure of 49 Mt CO₂ by 2050. Regardless of the decision made by the Government on the higher or lower figure of reducing emissions, in order to keep aviation in UK within the framework suggested, Bristol Airport should have no more than 12 mppa at 2050.

Referring to the Dft Aviation Forecasts, growth at Bristol Airport reach a figure of no more than 9 mppa at 2030.

The PCAA supports the lower figure of 37.5 Mt CO₂ given the impacts of climate change and the fact that non-CO₂ emissions have been excluded from any form of reduction.