**Parish Councils Airport Association (PCAA) response to Bristol Airport**

**Draft Final Master Plan Consultation 2024**

**to increase Airport capacity to 15 mppa November 2024.**

The PCAA represent 25 Parish Councils and 2 Town Councils with a population exceeding 70,000 residents in North Somerset and BANES.

The response was agreed by town councils and parishes at the PCAA meeting held on 16 January 2024.

The PCAA object to the proposed growth to 15 mppa, just over two years since planning consent was granted by Inspectors for growth to 12 mppa. The key points are summarised below:

**Executive Summary:**

* Further development to 15 mppa will impact on the rural landscape
* The visual study area surrounding the Airport needs to be increased from 5 km to 10 km. A dark skies policy is required due to the impacts from lighting.
* The Green Belt should be retained over the Airport and on land to be developed, with Permitted Development Rights retained.
* The UK is now one of the most nature-depleted countries. A further removal of 33 ha of land to car parking and for hydrogen infrastructure will result in an increase in biodiversity loss.
* A Mass Transit system is required before any further expansion beyond 12 mppa and this should not be bus based.
* The suggestions put forward for further A38 improvements are mere tweakings of the road network system and will not resolve issues of capacity and flow. The road network to the A38 is unsuitable and congested.
* A further 2,000 car parking spaces are required. An alternative to using green fields is a simple: single-deck storey over the Silver Zone Car Park.
* The Committee on Climate Change states that there should be no airport expansion. A cumulative assessment of emissions from UK airports is required to ensure that the sixth carbon budget is met.
* An increase of 15 new aircraft stands will increase ground noise and is unacceptable. Ground noise needs to be permanently monitored at both ends of the runway.
* It is unacceptable to increase night flights by 25%, an additional 1,000 flights. The current level should be maintained and preferably reduced.
* There should be no arrivals or departures within the night time hours of 02.00 - 06.00 hrs.
* Additional compensation to dwellings must be made for an increase in noise.
* Data on ‘Dispensations’ (flights arriving late and into the night period) need to be incorporated into the planning application. Mitigation for dispensated flights should be given.
* Air Quality should remain at its current limit and not deteriorate.
* The biodiversity baseline should be set at 12 mppa when all mitigations have been successfully implemented.
* The environmental impacts should be monetarised and widely publicised, comparing them with the economic benefits.
* Business passenger growth has remained static and the tourist deficit has increased. The Office for National Statistics showed that, for 2023, UK residents spent £72.4bn on visits abroad whilst incoming tourists only spent £31bn. This negates the claimed economic benefit.
* Planning permission for any proposed increase above 12mppa should not be granted until the effects of the increase to 12mppa have been assimilated and evaluated.

**An Alternative PCAA View on Growth to 15mppa**

The impacts of further growth on parishes surrounding the airport are going to be severe in part owing to the location of the airport, with an inadequate road structure. Everyone recognises that the road infrastructure is insufficient for more growth and that there will never be a rail link. The PCAA recognise that the Airport wishes to tap into the long-haul market. This is possible under the 12mppa planning consent by putting in a planning application just for the runway extension and agreeing to wait for a Mass Transit solution before any further growth takes place. The benefits from a Mass Transit route would be not just for the Airport but the surrounding parishes as well. Currently what is suggested in the Draft Masterplan brings no benefits to Parishes.

**Location of the Airport – Rural Landscape:**

The Airport is situated in a rural location. The proposals require development to the north of the airfield and west of the terminal and include fields to the south of the airfield. The land area to be developed is approximately 33 ha. The proposal is for incremental growth from 10mppa, then 12 mppa rising to 15 mppa with yet another 5 mppa proposed sometime in the 2030s.

The proposed development is likely to have significant effects on designated nature conservation sites and landscapes and other sites close by. The Airport is located close to:

* Felton Common
* Kings’s Wood & Urchin Wood Site of Special Scientific Interest (SSSI)
* Brockley Hall Stables (SSSI)
* North Somerset & Mendip Bats Special Area of Conversation (SAC)
* Mendip Hills Area of Outstanding Natural Beauty (AONB)
* Goblin Combe (SSSI)

The Master Plan recognises that the local landscape will be altered. The PCAA disagree that developing more planted bunds and screening will lessen the impact of development on current Green Belt. Due to the Airport’s location there should be no growth beyond 12 mppa.

**Landscape and Visual Impacts**

The impacts of growth to 15 mppa are not known yet and the mitigation for 12 mppa may not be adequate. The light spill from the Airport is already immense. Tree planting and reinforcement of the existing boundaries under conditions for growth to 12 mppa have not yet been completed. The mapping and assessment of landscape character and visible amenity for a 5 km study area is inadequate. For example, the light spill can be seen from Yatton and Kenn. The red lights from the cranes operating on the construction of the SCP 2 can be seen from outside Clevedon. The study area should be at least 10 km.

**Green Belt:**

The PCAA question whether the Airport can continue to use the argument of ‘special circumstances’ for the removal of Green Belt, particularly for car parking. The argument is used at each stage of airport development, in the 2009 and again in the 2018 application. To bring out the argument again makes a mockery of the policy to safeguard the green belt. We estimate a total of 33 ha will be removed. This is divided between the future hydrogen infrastructure and car parking. The PCAA support the retention of the Green Belt and continued Permitted Development Regulations on the Airport.

Building extensively on the greenbelt means that there will be more run-off which in turn will increase the risk of flooding to villages downstream which already flood. This would be reduced if the third multistorey carpark was built which is due before 12mppa is reached and by adding an additional canopy above existing single storey carparks which would double the capacity. This needs to be addressed.

**Biodiversity:**

It is impossible to comment on the impacts of development on the land required to increase capacity, approximately 33 ha. It is our understanding that the mitigation for biodiversity loss for growth to 12 mppa (which is only partially implemented) will be the future base line. The PCAA will question any assessments which are to be produced which are based on assumptions concerning mitigation that is not yet implemented. Too often projections about biodiversity improvements prove to be over-optimistic. The PCAA has always requested quantified data on bat numbers and quantified data on the increase of wildlife in areas planted with trees at Uncle Paul’s Chilli Charity and Friendship Farm at Bradford on Avon. These have not been forthcoming.

Note that one in six species are at risk of becoming extinct in the UK according to the latest State of Nature report September 2023. Removing a further 33 ha of land will only cause further loss of biodiversity.

**Transport:**

Due to the rural location of the Airport the road network surrounding it is highly inadequate. There is no rail link or dual carriageway. Simon Calder of the Independent labelled the Airport as the UK ‘worst connected airport’ for public transport. (Ref: September 2024).

The suggestion of a further 2.5% increase to a modal share of over 20% of passengers arriving and departing by public transport is unacceptable, the figure should be higher. However, there is a conflict because car parking is the Airport’s largest income stream and their financial incentives are to attract people to use their cars and use low-cost car parking on green fields to accommodate them. Bristol Airport readily admits that meeting the modal share targets is probably unachievable.

The Surface Access Strategy 2023 - 2028 states that *‘Bristol only has 14% non-UK based passengers, which is lower than all other major UK airports and presents a challenge in achieving the target PT mode share.*’ Note that 14% is under growth to 12mppa at 2028. The York Aviation assessment commissioned by Bristol Airport in 2019 showed that a mere 13% of passengers were for inbound leisure. This implies that the modal share is going to remain exceedingly low under growth to 15mppa as further growth will only increase the tourist deficit. Note: This point was recognised in the 2006 Master Plan which stated “*Public transport provision in the future falls into two categories: links to public transport interchanges and an increasing proportion of inbound passengers*”. Significant growth in inbound passengers looks like wishful thinking. The conclusion is that the A38 will remain at capacity and heavily congested.

NSC Policy C23 is currently the principal Core Strategy relating to development at Bristol Airport. It states: ‘*Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access structure’*.

The current road network is inadequate, for example:

1. The Bus Service Improvement Plan (BSIP) on the A38 is being constructed. The PCAA understands that the scheme is only able to serve the current capacity of the A38 and is not capable of meeting an increased demand of passenger growth to 12 mppa nor growth to 15mppa. Currently, the PCAA believe residents’ journey time accessing Bristol has deteriorated.
2. Assumptions for public transport to 15 mppa appear to be for bus-based public transport. This is exactly the same as in the Master Plan 2006 and is not good enough. The PCAA welcome the idea of Mass Transit, subject to route alignment and environmental impacts. But we note from the RASCO study for the Master Plan 2006 that “*for airports in the 5 to 15 mppa category light rail may be an option. However, the viability of light rail has been reassessed since the RASCO work was undertaken and most light rail schemes have been dropped on financial grounds. In particular plans for Bristol light rail have been abandoned.”* The Master Plan 2024 states that the delivery of the Mass Transit will take 10 to 20 years to deliver. The Master Plan currently states that the Mass Transit is at the outline business case stage which takes three years, followed by a feasibility study and viability study. The PCAA do not believe that the Mass Transit is deliverable within the growth period of 15 mppa to 2036. It is unachievable and therefore unfair for residents to have to bear the impact of more congestion on the A38. The deteriorating situation results in stress for employees getting to and from work and poorer productivity for employers.
3. The PCAA do not consider a Mass Transit proposal as a bus network. It must be another source of transport. Note the Inspectors at the Public Inquiry in 2021 ruled out heavy rail.
4. The Master Plan comments only on improvements to the A38. The wider network of roads needs considering with growth to 15 mppa.

The shared pedestrian and cycle link between the two airport roundabouts planned for 15 mppa should be brought forward for development under 12mppa to prevent an accident resulting in a death.

A Downside Road pavement and cycle link is urgently required to prevent a serious accident.

**Car Parking:**

The car parking at Bristol Airport is already on Green Belt land in a rural location close to designated landscapes. The proposals for car parking to 15 mppa show little imagination. There is no mention of a further Multi Storey Car Park (MSCP) other than the proposed MSCP 3 which should anyway be delivered for 11 mppa as a condition of the last planning application.

Further Green Belt car parking is not in alignment with North Somerset Council car parking policies of encouraging the use of public transport, reducing car emissions and safeguarding biodiversity. The proposed North Somerset Local Plan 2038 is expected to remove Green Belt status on the Airport. This means that the Silver Zone area would be operational land. The proposed development to 15 mppa shows that there is already anticipated to be a small amount of decking within the Silver Zone area. The whole area should be decked. A simple deck would easily accommodate the extra 2,000 car parking spaces required. Visual impacts to the south could then be screened by a wood on the fields designated for car parking. There could even be a green roof.

The impacts felt by local residents are significant as passengers:

* Park cars wherever space is accessible and free
* Park cars in villages where there is a bus connection to the Airport
* Block residents’ driveways
* Park in unsuitable rural dark lanes and take taxis
* Slam doors and make considerable noise when collecting their vehicles particularly at night
* Have vehicles whose lights shine into residents’ windows late at night
* Drop litter

These actions result in residents complaining regularly to parish councils. Parish representatives sitting on the Airport Consultative Committee complain constantly to the Airport Management Team. Very little happens until before a planning application is submitted and the Airport then decides that a Parking Summit must be held with concerned parishes. These Parking Summits have failed to stop the above actions.

Conclusion: the problems for residents never cease and will get considerably worse with expansion to 15 mppa due to Bristol Airport being operationally inefficient in delivering the infrastructure within correct timeframes.

**Staff Car Park**

The staff car park is to double in size from 1,000 spaces to 2,000. The PCAA question the need for so many spaces with the buses becoming more frequent and from more locations. This car park should also be decked.

**Airside:**

There are to be approximately 15 new aircraft stands. Can the additional noise from these stands be highlighted separately within the ground noise measurements? The PCAA object to any increase in noise from these stands. An acoustic fence needs to be sited at both ends of the runway to stop noise cascading down Goblin Combe and from disturbing the supposed tranquility of Felton Common.

**Carbon Emissions and other Greenhouse Gas Emissions:**

The PCAA note that the Airport is continually going against the advice of the UK Climate Change Committee. The last report from the committee in 2023 was damning and stated clearly that we must move away from fossil fuels. The CCC’s recommendation included that “no airport expansion should proceed until a UK wide capacity management framework is in place to annually assess and, if required, control GHG emissions and non-CO effects. The letter from Lord Deben and full report can be down loaded from this link <https://www.theccc.org.uk/publication/letter-2023-progress-report-to-parliament-to-rt-hon-prime-minister/> The PCAA demand that the Airport provide a cumulative assessment of growth at UK airports and show how the aviation sector fits within the Sixth Carbon Budget.

The PCAA note that the Sustainable Aviation Fuel Mandate (SAF) commences 1 January 2025 at 2%. Currently, there is no SAF available in the South West and not an adequate supply within the UK to support the aviation sector. The public need to know that no aircraft currently from Bristol Airport will contain this fuel or be told that the Airport cannot access the SAF required and are using the UK emissions trading scheme. The UK Emissions trading scheme should be shown within the Annual Monitoring Report by each airline.

There is an assumption that the carbon emission scheme put forward of: SAF fuel, green hydrogen with Emissions Trading Schemes and Carbon Offsetting will reduce emissions. Some of these schemes are uncertain and have a very poor reputation. The public want to see real emissions cut from the aviation sector which means fewer aircraft movements.

**Noise**

There is no acknowledgment that Bristol Airport is situated in a rural location which has very little background noise and this results in an increased impact of aircraft noise which is simply not captured by the metrics.

1. **Night flights**: **An increase in night flights of 1,000 to an annual limit of 5,000 night air transport movements. This is a 25% increase and not acceptable.**

The PCAA oppose any change to the night movement limit and believe the limit should remain at its current level of 4,000 atms. The Bristol Airport Q3 2024 ATM and PAX Report shows that for the months June, July, August and September there were approximately 23 flights per night without dispensations. If we include dispensations granted there were 27 flights per night.

The Master Plan shows that there will be an additional four flights per night. This means there will be a total of 27 flights per night without dispensations.

The Master Plan states that the vast majority would arrive between 23.30 and 02.00 hrs. This would mean a flight approximately every five minutes. This is unacceptable.

The limit of 4,000 flights per year should remain. A condition on flights per night should be set at say 15 and there should be no arrival or departure movements within the hours of 02.00 - 06.00 hrs.

There is no mention of increased noise levels from the Dreamliner, A321X LR and Airbus A350 from the extra fuel capacity required for long haul. These aircraft are large and have a higher maximum take-off weight. From presentations given on the Master Plan in December 2024 by the Airport Management Team we were unable to ascertain from any staff members if flights to the USA, Dubai and Doha were to be scheduled in the night period. These flights should not arrive or depart within the night time movement limit.

The PCAA fully support the Aviation Environment Federation (AEF) stance on night noise. The view from AEF is that

"*We reiterate our longstanding position that night flights should be banned at all UK airports for a full eight hour period each night other than for emergency purposes*".

1. **Ground Noise**:

It is disappointing that no ground noise measurements have been provided. Complaints have been sent in from residents requesting data on the noise level received from ground noise. No monitor is in place to measure ground noise until 2025. An acoustic fence should be put directly behind the runway ends of Goblin Combe and Felton Common to ensure that less noise reverberates across Felton Common and cascades down Goblin Combe to Cleeve Parish. The measurement area for ground noise is currently a 4km by 4km square centred on the existing Bristol Airport runway. This should be increased to a minimum of a 6 km by 6 km square centered on the existing Bristol Airport runway.

3. **Air Noise:**

The Airport is situated in a rural area, the increase in total aircraft movements from 85,990 to 100,000, is a 16.3% increase which will take away any tranquility left after the expansion to 12mppa and will have an adverse impact on residents' health and well-being.

Both the Noise Action Plans of 2019 - 2024 and 2024 - 2029 stated that respite would be given to residents by alternative flights paths being in operation 2026/2027. There has been no consultation with the public which was due this year. With no actions taken it is doubtful there will be any respite from noise for residents.

It is highly disappointing that by 2036 only approximately 75% of all movements will be undertaken by modern aircraft. At the public Inquiry to application 18/P/5118/OUT Bristol Airport stated that 73.1% of movements would be new generation by 2030 (for 12mppa). Jacob's Consulting, acting for North Somerset Council, stated that the figure would only be 67.6%. New generation aircraft have been promised to residents since the 2009 planning application for permission to grow to 10mppa with aircraft delivered within this decade. The target figure of 75% is too low. All UK airports are competing for the new generation aircraft. There should be penalties imposed if these are not delivered.

Within the noise document it states clearly that "*when considering the absolute change in noise level in 2036 some people are forecast to be subject to potentially significant air noise effects*". Noise insulation of a dwelling does not resolve the issue of lack of enjoyment in one's garden. The Airport must provide monetary compensation for the day time disturbance and night time disturbance of noise and the devaluation of dwellings.

4. **Dispensations of late arriving aircraft within the night time period.**

The Master Plan fails to mention dispensations. Dispensations were omitted from the 2009 planning application and the 2018 application. We note from Euro Controls and NATS that in the future due to capacity issues at airports, climate related issues, wars and strikes that delays are only going to increase. There were over 800 dispensations granted in 2023 and over 700 up to end September in 2024. These flights must be taken into account.

1. **Fixed Electric Ground Power.**

It is disappointing to see that there will still be a need to increase the Fixed Electric Ground Power to stands. Every aircraft stand should have them and there should be no use of Auxiliary Power Units. This is another example of the Airport not following through on Noise Action Plans - promising action on noise and not delivering and being operationally inefficient.

**Road Noise:**

The PCAA will comment once the assessments have been carried out.

**Air Quality:**

The PCAA will comment on air quality once we know the outcome of the assessment of growth to 15 mppa.

**Social and Economic Impact:**

The economic assessments produced for the Airport are always over optimistic on jobs. A detailed response will be given at the planning application stage. The PCAA note that the region has below national levels of unemployment, the jobs at the airport are generally low skilled. The Airport is a tourist airport with static business passenger growth. This is reflected in the top destinations and that the majority of aircraft movements are at peak holiday periods, Christmas, Easter, half terms and the summer months. The Draft Master Plan fails to mention the tourist deficit.

The Draft Master Plan has shown the economic benefits in terms of jobs but has failed to monetarise the environmental costs of the increase in carbon, noise and poorer air quality etc.