

Development Management
North Somerset Council
Town Hall
Walliscote Grove Road
Weston-super-Mare
BS23 1UJ

February 2019

Dear Sir/Madam

**APPLICATION 18/P/5118/OUT - BRISTOL AIRPORT, NORTH SIDE ROAD, FELTON,
WRINGTON BS483DP**

Introduction

1. CPRE Avonside shares and endorses the visions of the various local authorities of a thriving West of England economy, urban and rural, in the context of a sub-region with exceptional advantages in terms of access to beautiful, often protected countryside and rural amenities. The challenge is how to build that economy for the future without degrading the exceptional advantages.
2. The planning application for a major expansion of Bristol Airport falls straight into that trap.
3. CPRE Avonside therefore formally objects very strongly to this application.

General

4. We fully endorse the detailed analysis and arguments set out in the submission and objection from the Parish Councils Airports Association, the main elements of which are reiterated below.

Wider Sub-Region

5. Over and above the detailed arguments as to why this application should not be permitted, CPRE considers that there are major issues involved that affect the entire sub-region (not only N. Somerset but also B&NES, S. Gloucestershire and Bristol itself and indeed an even wider area in certain respects).
6. CPRE therefore strongly believes that this application must be considered in the wider context of the emerging Joint Spatial Strategy before N. Somerset, as the legally responsible planning authority, takes a view on it.
7. Local Authorities are under a statutory “duty to cooperate” with each other. That duty should not be interpreted merely as a technical exercise showing that various

processes have been gone through and data exchanged. It is intended to be a material and substantive duty designed to ensure that each local authority has a proper understanding of the issues affecting, and the real-world impact on, the residents of the neighbouring authorities - their preferences, priorities, economic and social welfare.

8. CPRE's view is that if N. Somerset were to proceed to handle this application by itself, without first allowing it to be assessed in the context of the wider Spatial Strategy, this would at the very least be contrary to the spirit and intent of the "duty to cooperate" with the neighbouring Authorities.

Wider Impacts

9. CPRE Avonside identifies the following major wider impacts of the Airport outline planning application:

Environmental

- The application breaches key aspects of the NPPF, specifically paras 133-147 in respect of the "Green Belt" and impact on the much wider AONB which covers part of the sub-region.
- The proposals involve what is clear "green belt hopping" as well as having more general impacts.
- There would be a significant increase in aircraft noise, with extended flight paths and greatly increased flight frequency. This would be seriously detrimental to the tranquillity and quality of rural and village life across a wide swathe of the sub-region.
- Inadequate information has yet been provided on the inevitable changes to the forecast noise levels, carbon fall-out, flight paths or visual impact of low-flying jets. This is a serious omission without which proper consideration cannot be given to the application.

Transport and Traffic

There are major flaws in the analysis of the traffic and transport impacts of the proposal:

- CPRE has already observed in commenting on the emerging Joint Transport Plan that the potential impact of expanding Bristol Airport is only addressed in the most cursory way. Our view is that the JTP as it stands does not fully mitigate the overall traffic effects inherent in the JSS, let alone improve upon existing, already unacceptable, levels of congestion and pollution. Figures in the various technical papers themselves bear this out. Adding in the additional traffic from an expanded airport can only worsen this and must be regarded as unacceptable and unsustainable.

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tranquillity and diversity
of rural England by encouraging
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- CPRE strongly favours reliance on public transport rather than the private car for serving access to major facilities such as the airport. It is clear from the proposals for greatly increased parking that this view is not shared by the airport owners.
- However, even if it were, CPRE's view is that in this case, even the most ambitious public transport links would be unlikely to achieve the desired objective. This is because the airport operator's intention is to attract passengers from a much wider, more dispersed catchment area. It is inevitable and unavoidable that most of those passengers will travel by car.
- The aim of widening the passenger catchment area also has major implications for the regional motorway and trunk road system and these have not been properly evaluated or challenged. All the motorways and trunk roads in the region are operating at or near full capacity for increasing proportions of the day and year. The number of incidents, some of the most serious variety is becoming more and more frequent. Highways England increasingly appear to be relying on the "smart motorway" solution to manage congestion and flow. However, the House of Commons Transport Select Committee has recently cast serious doubt on the safety and effectiveness of measures such as use of the controlled hard shoulder for running traffic.
- A full assessment by Highways England of the traffic impact of the airport proposals across its regional network is needed before any application can be considered. That assessment needs to include a risk assessment of the likely increase in incidents that block the motorways and of the near certainty that when that happens traffic will seek to divert in ever larger numbers, onto local, unsuitable roads, with even greater damage to the environmental, quality of people's lives and safety.
- Clearly, those impacts will spread widely across the other local authority areas and CPRE would expect the other local authorities to resist the expansion plans on those grounds as well as many others.

Wider economic aspects

10. The plans for airport expansion are predicated on relatively optimistic assumptions about the UK (and global) economy and the propensity for air travel. At the present time these are decidedly more speculative than usual and are thus not a sound basis for a major planning application of this scale which, were it to be allowed to proceed, would catastrophically damage and prejudice the sub-region's precious rural areas in a way which could never be fully rectified even if the demand and pattern of air travel were to evolve to a very different point from that which is envisaged by the airport owners. For that reason, also, this application is premature, misconceived and must be rejected.

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