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24<sup>th</sup> May 2019

Dear Sir/Madam

**Further comments on APPLICATION 18/P/5118/OUT - BRISTOL AIRPORT, NORTH SIDE ROAD,**

We note the further information submitted by Bristol Airport to support the case for expansion of its throughput capacity to 12 million passengers in any 12 month period. The application also includes addition of up to 4,800 new car parking spaces and various other infrastructural additions and changes.

Nothing we have seen to date changes our position that this expansion will be damaging to the landscape and environment of North Somerset, including impacts on the visual landscape and character of this rural area and Green Belt location, loss of tranquillity and noise pollution, unacceptable carbon emissions and increases in air pollution, as well as damage to biodiversity. Further to that, we believe that the economic case that is driving this expansion is seriously questionable.

**Lack of evidence to support economic claims**

We do not see the evidence in both the socio-economic case presented now, or at the time of the application, to support the claims that the airport will bring economic benefit either to North Somerset or to South Bristol. Indeed, we believe that the methodology put forward by York Aviation is vulnerable in terms of distribution of economic impacts. The report refers to poorer areas in Bristol benefiting from the airport expansion, and the Bristol Mayor has referred to this numerous times, but there is no evidence that airport expansion will involve employing people in the more deprived areas on the Bristol fringe estates like Hartcliffe. The impact of the expansion could easily be the opposite, and may worsen the inequalities in the region.

Furthermore, the methodology appears to be vulnerable on the grounds of generalisation, particularly in the benefits that derive from the direct and indirect employment at the airport. We are not satisfied that there is sufficient analysis of the types of employment that will benefit from the expansion of the airport, so, in effect a low paid unskilled worker has the same status and 'economic benefit' as a skilled, higher paid, engineer. The 'evidence' put forward appears to be

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simply an assertion, not based on clear information that enable local decision makers to judge this case properly. Indeed, our concern is that the significant and as yet unexplored costs that this expansion brings, could just as easily place a cost-benefit ratio into negative figures and a situation where North Somerset and Bristol are actually worse off as a result of this expansion.

### **Unmeasured costs of congestion and poorer air quality**

Our concerns include the costs associated with increased congestion. As most people travel to the airport by car, and we can see no significant difference that would cause that to change significantly (including part of the planning application being a significant increase in car parking spaces), congestion around the airport, on local motorway route, and in South Bristol itself, are likely to increase - possibly significantly. This brings direct economic costs associated with delays, longer journey times, uncertain journey times; and also indirect costs associated with well documented health problems that arise from poor air quality. We believe that it would be economic madness to approve this expansion without fully understanding the implications of the increased car use for North Somerset and the local area, for Bristol, and indeed the whole of the West of England, and South West.

### **Economic costs of landscape degradation and loss of tranquillity**

One of North Somerset's most valued assets is its rural location, its beautiful landscapes and the opportunity for residents and visitors to experience tranquillity within striking distance of Bristol and Bath. Nowhere in the economic case that Bristol Airport has submitted, both initially and subsequently, that assesses or even recognises the potential economic cost of expansion of the airport could bear on the local economy through loss of this valuable asset. Before a decision is made on this expansion, we would like to see fully costed economic modelling that assesses the cost-benefit of damaging this local resource. Indeed, the York Aviation methodology appears to ignore all external costs generated by the airport, including noise and air pollution from planes, ground vehicles and surface access. It is vital, if decision makers are able to make a full cost-benefit assessment that this information is openly available.

### **Impact of aviation on climate change**

We are not satisfied that the evidence submitted by Bristol airport makes an effective assessment of the impact of aviation on climate change, yet this is generally recognised to be substantial. We fail to see how decision makers can assess the impacts on their own targets, both local and national targets, if adequate information is not available. Furthermore, as we stated in our previous response, and in our letter to James Brokenshire, Secretary of State, we believe that this expansion is a matter that is not suited to decision making at a local level. This needs to be assessed against national, as well as local, targets, including for climate change, economic growth, and traffic generation, on a national basis which takes account of the proposed expansion of other airports and national commitments to climate change mitigation. We feel strongly that it is unreasonable to expect local decision makers to make judgements on an issue that will have wide ranging local,

regional and national impacts, particularly where there is a lack of clear evidence for many of the assertions being made.

#### **Urgent need for further information**

The seriousness of our concerns has led us to take the unusual step of commissioning our own independent review of the economic case for Bristol Airport's expansion from the New Economics Foundation. This will include i) a review and critique of the technical documentation, ii) an assessment of the carbon impact, and the potential compatibility with local and national targets, iii) an Economic Credibility Assessment the project's local and wider economic and un-monetized benefits and finally iv) a review of the positioning of the proposals in the context of national and regional economic development plans, and other airport expansion proposals eg Heathrow. We urge a decision on this application to be delayed until the appropriate evidence is available to inform the likely outcome.

Yours sincerely

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