



**CPRE Avonside**

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**Bristol**

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**Your airport: your views. Towards 2050. Master Plan Consultation - Stage ii**

**Development Proposals and Options**

**July 2018**

### **CPRE Avonside Response**

1. The Campaign to Protect Rural England (CPRE) welcomes the opportunity to respond to this consultation on Bristol Airport, Stage ii Development Proposals and Options. CPRE exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country. We fight for a better future for the English countryside and work locally and nationally to protect, shape and enhance a beautiful, thriving countryside for everyone to enjoy. CPRE Avonside comprises the four districts which cover the West of England Sub Region and the old County of Avon.
2. As a charity of around 60,000 members, a branch in every county, over 200 district groups and more than 2,000 parish councils, CPRE have had an interest in many of the recent proposals to develop airports across the country. CPRE has fed in comments to a range of consultations carried out by the Airports Commission. CPRE Avonside remains firmly of the view that there should be no Bristol Airport expansion, including to 12 million (a 50% increase in current numbers), and eventually to 20 million, passengers a year.
3. An expanded Bristol Airport would be a disaster, not just for the sub region's environment and transport infrastructure, but also for England's economy as a whole, encouraging more housing and transport infrastructure in the South of England, and negatively impacting on the balance of the UK economy. Bristol airport would become disproportionately large compared to other regional airports

and its impact on the sensitive environment of North Somerset and the West of England, the Avon Green Belt and Mendips AONB would be entirely unacceptable.

4. Yet this is only the beginning. Bristol Airport has made it clear it wants to keep on growing. If this goes ahead, we fear that this would be devastating for our local countryside and infrastructure, while making runaway climate change unstoppable. Instead of further expansion, we need genuine support for improving access to the airport right now, and fulfilling all agreements made at previous planning stages. At a national level we believe that the Government is failing to promote alternatives to flying. Ferry services are being cut back, while once promised long-distance rail services from the English regions to destinations across Europe are still not being provided. Meanwhile millions of pounds are being pumped into regional airports in grants and hidden subsidies. As a result, many people are opting for planes simply because this is easiest and cheapest.

#### **Section 1 - Growth to 2040:**

5. CPRE believes that the recent rapid expansion of aviation exceeds environmental limits. This is not only in terms of global issues such as climate change and the use of finite oil resources, but also because of the direct impact on the English countryside. Air quality, the landscape and tranquillity are already suffering. Continued expansion at Bristol airport is unsustainable even if there are technological improvements.
6. Worse still, the more aviation grows, the more the risk is that other sectors will have to do more to reduce carbon emissions if overall targets for carbon reduction are to be met. Besides the economic cost to traditional industries and farming, this could require an even greater increase in energy infrastructure, putting pressure on our landscapes across the country.

#### **Consultation point design options**

7. No clever design solutions take away from our conclusion that any expansion of the airport size and/or capacity would breach environmental limits, whether in relation to landscape, Green Belt, air pollution, carbon emissions, or congestions. These environmental costs cannot be traded off against projected (not guaranteed) economic benefits.

#### **Question A: The entrance gateway**

8. This should be as unobtrusive as possible, and blend into the surrounding landscape.

#### **Question B: The airport's boundary and public areas**

9. Local views and residents should be protected with suitable landscaping including raised areas, trees and planting to minimise visual intrusion and noise.

**Question C: The airside platform extension to the airport's aviation infrastructure:**

10. We don't see how a raised platform can possibly be minimised in terms of visual and noise impacts. We strongly object to this extension to the airport's aviation infrastructure based on the information available. We require a thorough Landscape Assessment, with consideration of the impact of this extension on landscape and character, as well the impact on tranquillity and light pollution. CPRE's tranquillity and light pollution maps can be used as a baseline.

**Section 2 - Towards 12 million passengers a year**

**Q2: What comments do you have on our plans for increasing the airport's capacity from ten to twelve mppa?**

11. We find this consultation questions misleading as the Airport's plans clearly go beyond 12 mppa, to 20 mppa in the 2040s. Given the current mppa is 8, even 12 represents a 50% increase, which is significant. Already, air traffic causes over a tenth of the UK's contribution to climate change. Planes are disrupting the tranquillity of the North Somerset countryside and disturbing the lives of local people. Extending the airport would mean it would further become a magnet for big car parks, roads and sprawling housing and economic developments that eat into the surrounding countryside.
12. We object to Bristol Airport's proposal to release further areas of Green Belt to accommodate airport growth. In fact this is just the tip of the iceberg, as it has failed to assess a wide range of impacts on our precious countryside.
13. This airport is already located in the Avon Green Belt. The Green Belt is a public good that is for the benefit of everyone, city dweller or countryside dweller. It encourages redevelopment in our towns and cities and discourages urban sprawl and damage to our countryside, one of our key national assets. We strongly believe that expansion of the Bristol Airport is entirely at odds with the purpose of the Avon Green Belt, a purpose that is just as, or even more, valid as it was when it was designated, as the pressures on it are infinitely greater than they once were and make its role even more vital. It is the green lungs of the city, a space where people can go for free to enjoy respite from everyday lives and tranquillity without having to travel long distances. This public purpose is more important, not less important, than the private economic benefit of Bristol Airport.
14. We would also expect that any airport expansion would, in line with the Natural Environment White Paper, contribute to a net increase in biodiversity. This should be in recognition that biodiversity increases do not mitigate for loss of Green Belt, landscape, tranquillity, dark skies and all the characteristics that make rural areas such loved and valued areas for visitors and residents. It is little wonder so many communities, councils and campaigners are viewing the Airport's expansion plans with dread.

15. Economically we are not convinced that the airport has as much as it claims to contribute to our local economy. Cheap flights have led to a further cost to the countryside: people in Britain holiday abroad much more than people in other European countries. This contributes to a huge 'tourism deficit', with more money spent on holiday abroad by people living here than foreigners spend here on holidays.
16. In the previous January 2018 consultation, we asked for information to be provided on the following impacts, in a format that allows a comparison of the scenarios, and with a no-further-growth scenario. We repeat that request for the following information:
- Traffic forecasts for different public transport scenarios, including the impact of a mass transit system.
  - Infrastructure proposals
  - Impact on local people and the natural environment - including tranquillity, dark skies, landscape character, biodiversity.
  - Independent economic forecasting and growth rates in light of the most up to date information and with regard to Brexit post 2019. We are not inclined to accept a 'predict and provide' approach to increasing passenger numbers, which has long been discredited as an accurate forecast mechanism.
  - Comparison of noise and light pollution impacts of growth options as compared with the current situation.
  - Conditions to minimise impact on residents and the environment
  - Detailed analysis of the employment to be provided
  - Detailed assessment of likely impact on roads traffic for at least a ten mile radius.

**Q3: Highways improvements to the A38; public transport access to the airport; improvements considered for 12 mppa**

17. Current access to the airport by public transport is unacceptable and it is not surprising that the vast majority of travellers drive to the airport. Those who travel by bus have few options; on busses that are vastly inflated in price. We strongly believe that this is an unsustainable airport location, heavily reliant on parking in Green Belt and driving on roads that are not fit for the capacity of cars. However, we firmly believe that widening and building more roads, and provide more parking, would be counterproductive. Evidence shows that new roads generate more traffic, and soon become 'full up'. The South Bristol Link is a case in point, and is regularly already at capacity or over capacity. No new car parking should be provided for the airport to facilitate expansion. Current levels of passengers should be encouraged to use public transport by vastly improved busses with much lower fares. A light rail to the airport must also be considered to facilitate faster public transport from Bristol.
18. We do not consider park and ride as a suitable public transport solution, as it requires access to a car in order to access the 'ride'. They are land hungry in this

constrained landscape and do not substitute well planned, frequent public transport.

19. We believe that expansion of the airport is not sustainable and should not be permitted. Any mass transit or public transport system should be accessible to and benefit the local population to make up for the problems the airport causes locally.
20. An integrated transport network was promised under the airport planning consent of 2011. Bristol Airport should invest in this network itself without waiting for further public funding. All promises made in previous planning rounds should be fulfilled before further applications are made or granted.
21. Any expansion would need to include the Airport making substantial contributions to sustainable transport options, including consideration of light rail, improved local bus services with reduced prices, as well as other road demand management measures, such as peak road pricing to meet air quality limit values. This would all have further negative impacts on local people and businesses. Expansion of Bristol airport should be predicated on a no net increase in traffic basis by the operator investing in alternatives to driving and Influencing Travel Behaviour programmes to reduce existing motor traffic by as much as airport expansion increases it.
22. Increases in congestion will have a negative impact on the economic case for the Airport. In 2015 Department for Transport were forecasting a 121% increase in congestion by 2040 on the Strategic Road Network. This would mean that airports will increasingly be judged less by whether they are local but whether they are quickly and reliably accessible.

**Q4: Comments on how we should manage the effects of our proposals on the environment and local communities?**

23. As stated in our response to Your Airport, Your Views, January 2018, we would like the airport to also focus on the following local concerns. We don't see enough evidence in the May 2018 consultation paper that there will be work to address these concerns:
  - Noise pollution - residents should be able sleep undisturbed at night and walk locally without being disturbed by aircraft noise. The airport should make commitments to noise pollution limits. First step would be to undertake proper noise pollution studies based on CPRE's tranquillity maps, taking 30-40 dBs as the baseline (rather than 70 dB), which is a more accurate reflection of normal background noise levels in rural areas.
  - Light pollution - visitors and residents should be able to see dark skies rather than an illuminated landscape. The airport should make commitments to light pollution limits. CPRE has produced light pollution maps that indicate the level of change over the lifetime of the Airport. Light pollution should be minimised.
  - Illegal parking and waiting - the airport should condemn all illegal parking and contribute financially to North Somerset Council's enforcement of parking on Green Belt.

- Road safety - airport traffic has reduced the ability of people to cycle along the A38 and local roads in safety. We would like to see the Airport making commitments to help stop local roads turned into rat runs for airport usage before it considers further expansion of this facility. The use of these country roads for airport traffic creates pollution, congestion and considerable danger to local people.

24. As much as we welcome contributions to local insulation, this is not much use in your garden or when out walking the dog, or does it benefit non-residents who want to enjoy the countryside. Worse still, the impact on nationally protected countryside and landscapes cannot be assessed just in terms of whether you can or can't see new airport buildings. The devastating impact of the sight and din of aircraft circling over the Avon Green Belt and even the Mendips AONB must be taken into account.

25. It is highly likely that such an expansion in the airport as from 10 million passengers per year to 20 million will require far more than just the land to accommodate airport and local transport infrastructure. There is a knock on effect with additional development resulting from airport expansion, which could result in further de-designation of the Green Belt, and greater impacts on the environment of North Somerset and the West of England, and the Mendips AONB. The special environmental qualities that make this area such a desirable place for people to live and work will diminish and we could lose what makes this area a special place to live, work and visit. This is of course likely to bring substantial negative economic impacts.

**Q5: What opportunities are there to enhance the local area through our proposals for 12 mppa?**

26. The current planning approval layout of 2011 shows a transport interchange. This needs to be delivered before development consent for any new scenario is given. CPRE Avonside concludes that we are unable to make informed comment on the scenarios as we have seen no traffic forecasts, noise assessments and environmental assessments for expansion, compared with current situation. These must be funded by the Airport but carried out independently and the results fully published. The land acquisitions are all using Green Belt land, which should only be developed in exceptional circumstances. The for-profit environmental consultants employed by Bristol airport in connection with the previous master plan (2006) destroyed any credibility in their objectivity by uncritically supporting the airport.