

Expansion of Bristol Airport to 12mppa - Planning Appeal

PINS Ref APP/D0121/W/20/3259234

Planning Application Ref: 18/P/5118/OUT + consultation 20/P/2896/APPCON

Statement of Case for Bristol XR Elders Group

Supporting the refusal of this application by North Somerset Council

1. Background and Introduction

1.1 XR Elders is a group of older people concerned about the climate crisis and the current lack of action to avert its worsening impacts on future generations. We made individual objections to this planning application, but joined together to present evidence to this appeal. We did this when, despite the impact of the pandemic on air travel, BAL were still proceeding with their application to further expand their airport capacity.

1.2 In consultation with other third parties, our case is concentrating on:

1. Planning policy reasons for refusing the application to expand Bristol Airport;
2. The impact of the COVID-19 pandemic and climate change on future demand for air travel and the implications of this reduction in demand for the application and this appeal. We will argue that the application is now premature and not justified.

2. Policy Context and Reasons for Refusal

2.1 The reasons for refusal of the application were (in summary):

1. The Airport has permission to expand to 10mppa, and further expansion beyond this will generate additional adverse environmental impacts on communities surrounding the airport that are not outweighed by likely economic benefits and are contrary to policy CS23 of the NSCS.
2. Noise and air quality impact generated by increased aircraft movements, particularly at night, would have a significant adverse impact on the health and well-being of local residents contrary to policies CS3, CS23 and CS26 of the NSCS.
3. Carbon emissions are not reduced, the proposal does not contribute to a transition to a low carbon future and it would exacerbate climate change contrary to national policy and policy CS1 of the NSCS.
4. The extension of the Silver Zone car park and year round use of the seasonal car park are inappropriate development in the Green Belt. There are no special circumstances justifying the development and it is contrary to the NPPF and policy DM12 of the DMP Local Plan Part1.
5. The proposed public transport provision is inadequate resulting in unsustainable development contrary to the NPPF and policies CS1 and CS2 of the NSCS.

2.2 Reasons for refusal 1 and 2 have been robustly evidenced and supported by the PCAA. The adverse environmental impacts of the proposed development are contrary to policy in the Development Plan and underplayed in the Appellant's evidence. Policy CS23 of the NSCS requires any expansion or other development at the Airport to have satisfactorily resolved environmental issues and the impact on surrounding communities, and the proposals have not done this. The reasons for refusal 1 and 2 are supported by planning policy and the evidence of PCAA.

2.3 Reducing Carbon Emissions: The NPPG emphasises that planning and development plans have a statutory duty to introduce policies to tackle climate change. It draws attention to the Climate Change Act 2008 and the system of regular carbon budgets it introduced as relevant for planning decisions. (Ref: ID 6-001-20140306 and ID 6-002-20140306). The NPPF (para 148) states that planning “should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions”. North Somerset Local Plan Policy in the NSCS (CS1) states that the authority is committed to reducing carbon emissions and tackling climate change.

2.4 The need and policy support for carbon reduction will be detailed by other parties, but it cannot be acceptable, where policy requires reduction, to argue as the appellant does, that their increase in emissions is acceptable because compared with the overall national carbon load it is small (Planning Statement: para 5.14.9). Logically, this argument repeated by every carbon producer would make the targets of the Climate Change Act and its budgets impossible to achieve. The NSC Officer’s report similarly accepts that increased carbon emissions are ‘not significant’ (page 38) although their own NSCS policy CS1 is looking for a commitment to reduce emissions. The continued reliance on private cars for journeys to the airport also increases emissions, and the proposal has not adequately addressed the issue of reduction of carbon emissions. Reason 3 has properly applied national and local planning policy in refusing the application therefore.

2.5 Inadequate Public Transport Provision: Travel to and from Bristol Airport is overwhelmingly by private car and the airport has one of the lowest modal share of public transport journeys to airports in the UK (NSC officer’s report; table page 85 and Wood EIS for BAL; Parking Strategy 2018: para 4.2.2). Providing yet more parking that perpetuates this situation, and with no proposals for a robust public transport infrastructure and pricing mechanism that would significantly improve the situation is not acceptable and contrary to the NPPF (para 103) and the NSCS policies CS1 and CS10. Policy CS10 requires transport schemes to deliver better public transport schemes, reduce adverse environmental impacts and contribute towards carbon reduction.

2.6 Additional parking provision is proposed to be ‘low cost’ parking because this is what customers want (Parking Demand Survey 2018 para 7.12 page 32). The proposed development continues to promote travel by car to the airport on a ‘predict and provide’ basis therefore. No detailed viability assessment has been requested by the Local Planning Authority to test the reasonableness of the current parking strategy and pricing, and options that could influence the modal split of journeys to the airport. Bus services to the airport are relatively expensive, which mitigates against their greater use. There are also clear indications that the proposed increase in parking is designed to generate a surplus of places that will draw custom from the current unauthorised providers (Parking Demand Survey 2018 paras 6.3 and 7.6). The proposed transport strategy has not been robustly examined with financial viability options to significantly alter modal choice considered and made transparent. In the absence of proper consideration of strategies and financial tools to increase public transport and reduce reliance on private cars, reason for refusal 5 has properly applied local and national planning policy promoting sustainable travel.

2.7 Inappropriate Development in the Green Belt: The preference of customers for low-cost parking solutions has been used to justify building further car parks and intensifying existing use in the Green Belt. Some of this expansion is acknowledged to be an attempt to capture more of the market for parking provision associated with use of the Airport (as previous ref). The purpose of Green Belts is defined in the NPPF (para 134), which also states that their essential characteristics are ‘openness’ and ‘permanence’. Particularly relevant criteria from the NPPF for the purposes of the Green Belt around the Airport are the following:

- a) To check the unrestricted sprawl of large built-up areas;
- c) to assist in safeguarding the countryside from encroachment.

2.8 Car parking is inappropriate development in the Green Belt by way of its impact on the openness of the landscape, as agreed by both the appellant (BAL SoC para 9.1) and the NSC Officer’s Report for this application. Policy DM12 in the DMPLP states that inappropriate development in the Green Belt will not be approved except in very special circumstances. Car-parking requires the introduction of lighting, security and signage structures besides hard surfacing and fencing, and in the countryside, introduces a jarring visual series of ranked motor vehicles into an agricultural landscape. This application proposes the intensification of a permitted summer seasonal use on 7.8 ha of the Green Belt (the Silver zone carpark) for parking to be year-round, and the provision of permanent structures to support this. The adverse impact on the openness of the green belt will no longer be restricted to temporary structures in the lighter days of summer. Winter lighting of the site will be much more intrusive due to reduced daylight, with adverse impact on the dark skies of the nearby Mendip Hills AONB (AONB objection letter Jan2019). The visual intrusiveness of the car park will be significantly increased as well. This, and the proposed permanent structures to support the unrestricted use, will both intensify the adverse impact on the openness of the Green Belt and further erode its permanence.

2.9 The Environmental Statement submitted with the application assessed the landscape and visual impact of the proposals as having ‘localised moderate significant adverse effect’ (BAL SoC: Table 3.1). Visual impact is an important aspect of defining impact on openness within the Green Belt. In fact the Mendip Hills AONB Partnership in their objection to the application state that the visual impact of this development would adversely impact the setting of the AONB and be visible from vantage points within the AONB, compounding ‘the current impact of BAL on the ...special qualities of the Mendip Hills AONB’ (letter of objection Jan2019). The AONB partnership are also concerned about the worsening impact on the tranquillity of the AONB from increased aircraft movements and increased traffic.

2.10 Beyond intensifying an existing use, it is proposed to extend car-parking into the Green Belt on a linked extension to the Silver Zone Carpark of 5.4 ha. The same issues of adverse impact on openness apply here, as well as further erosion of the permanence of the Green Belt boundary. The NPPF (para 136) states that Green Belt Boundaries should only be altered:

“where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”

Policy CS6 in the NSCS states that:

“further amendments to the Green Belt at Bristol Airport will only be considered once long-term development needs have been identified and exceptional circumstances demonstrated.”

It is our case that this proposed development in the Green Belt is premature because it has not been undertaken within a plan-making process as required by the NPPF, and the justification for Policy DM50 of the NSC DMPLP. Long-term development needs identified in the application were considered too optimistic prior to the pandemic by NSC officers. We argue below that the revised projections are still too optimistic and have not taken the true impact of the pandemic and other changes into proper account. Thus long-term development needs for this intrusion into the green belt have not been demonstrated, they have not been fully evidenced and are not justified by ‘exceptional circumstances’.

2.11 The Parking Demand Survey 2018 (para 5.1), submitted with the application stated:

“We have also considered the impact of autonomous vehicles on parking demand. However, our research and analysis indicate that there would be no impact until 2030. Therefore, any consideration of how vehicle autonomy would disrupt parking demand at the airport is not required at this stage.”

In fact the impact of autonomous capability may well be felt before 2030, and, as our revised estimates of likely passenger numbers discusses in Section 5 below, it may well be 2035 before the currently permitted car parking provision is not adequate with existing vehicle technology. The major car manufacturers are commissioning studies into the future of mobility and in particular the effect of autonomous vehicles. Autonomous capability is already being incorporated in new models and with Level 5 (full autonomy) capability for most new vehicles expected in 2023. Although the enabling legislation to allow Level 5 vehicles on public roads may take longer, autonomous parking is already being planned as it allows a 50% increase in parked cars for the same floor area (Mark Potter – Parking and Property Conference, London 2017). Self-parking technology and future autonomous capability of cars will reduce the demand for car parking space at the airport, and it is very likely with the postponement of the projected increase in passenger traffic even the Applicant acknowledges, there will never be a requirement for this extra parking provision in the Green Belt.

2.12 The appellants have argued that if their proposed extension to low cost parking at the airport is not met, parking demand will transfer to the unauthorised arrangements found around the airport (Parking Demand Study 2018 para 6.2). Effectively the new parking development is seen as offering more acceptable competition to the unauthorised parking provision. However there are adequate policy and enforcement powers that can address unauthorised off-site airport parking. Policy DM30 in the DMPLP restricts off-airport parking outside of the Green Belt, and Green Belt policies in the NPPF and the Local Plan restrict parking provision as inappropriate February 2021

development within the Green Belt. Expanding low-cost parking at the airport within the Green Belt, in order to prevent parking elsewhere in the Green Belt, is not rational or supported by policy.

2.13 Although the appellant claims to have considered alternative locations for airport park and ride, there are alternative commercial proposals, more conveniently located by the motorway network, that should be given serious consideration as preferred alternatives if the need for additional parking is accepted. The NPPF (para 141) requires the LPA to plan for positive enhancement of the Green Belt once it has been defined, including to enhance landscapes and visual amenity. The NSC Officer Report recommending approval of this application has in our view not properly requested evidence on all options for the transport strategy, and location of its infrastructure, before accepting this reduction of landscape and visual amenity of the Green Belt and incursion into it.

2.14 To accommodate Bristol Airport's location within the Green Belt and allow for some expansion of the airport, an inset area has been defined at Lulsgate within the defined Green Belt. Policy DM 50 of the DMPLP defines this area and conditions development within it to minimise environmental impacts and emissions. The same policy also requires provision for surface access to the airport to mitigate the adverse impact of airport traffic on local communities and improve public transport services. Multi-storey car parking for further expansion could be provided within the inset, but as this is not considered commercially viable, the proposals include substantial incursions into the Green Belt for surface car parking. No detailed viability study appears to have been submitted to support the commercial necessity of extending car parking in the Green Belt. Without justification, the 'very special circumstances' required before inappropriate development in the Green Belt should be granted (NPPF para 143) cannot be properly demonstrated.

2.15 Legal precedent has determined commercial viability is a material consideration for planning purposes, and that the council may come to a decision that for these reasons the 'very special circumstances' required for allowing inappropriate development in the Green Belt may be said to exist (Failed judicial Review Ref CO/6483/2016). We argue here however that officers should not have come to this decision when making a recommendation to committee in February 2020. A year and a pandemic further on, future expansion beyond that already permitted is not going to materialise in the short term. Particularly relevant for the proposed development in the Green Belt, is that increased parking demand associated with any future expansion is not going to be needed in the short term, and in the medium to long term technological change may render land for expansion of car parking unnecessary. At this point in time therefore, and with this application, there are no special circumstances that would allow this inappropriate development in the Green Belt and so it is contrary to national and local planning policy. Reason for refusal 4 has been correctly applied to the application and this development proposal.

3. Impact of the COVID Pandemic

3.1 Due to the impact of the pandemic on the airline industry and the steep reduction in flights from BAL in 2020, the Appellant has submitted revised passenger and traffic forecasts to inform and support their appeal. COVID-19 is seen as a 'short-term' impact (BAL SoC para 1.6), and it is suggested that expanding the airport and passenger numbers will support recovery from the pandemic in the region. The Appellant is "confident that the impact of COVID-19 will be temporary" (BAL SoC para 3.7).

3.2 **Effects of COVID-19 on air travel** No evidence was offered for this upbeat assessment that COVID would only have a 'short term' impact on future demand. COVID-related deaths so far number 2.5 million worldwide, orders of magnitude greater than any other disease outbreak this century, such as SARS (2003) and MERS (2015) [1] (much more localised and many fewer deaths) or avian flus (low death rates due to Avian-Human rather than Human-Human transmission)[2-4]. The unprecedented magnitude and spread of the COVID-19 pandemic thus makes it impossible to predict its extent and future time-course from previous disease outbreaks.

The consequences of catching COVID-19 include sickness, death, debilitating long COVID (10% of adults) [5], recently also reported in children [6] and risk of infecting others. Understanding of these consequences will cause caution in some, and may influence behaviour to cause a negative impact on flight demand.

3.3 **Emerging variants of the SARS-COV2 virus:** Mutations during replication of the SARS-COV-2 virus (that leads to COVID-19 disease) have resulted in emergence of worrying variants. Variants first detected in Kent, South Africa (SA), Brazil and recently Bristol are more transmissible (by 40-70%) than the original SARS-COV-2 [7]. Some variants have a mutation (E484K) which reduces immune responses and probably also reduces efficacy of some vaccines, although to what extent remains unclear [7]. The Californian and Kent variants are thought to cause more serious disease [8]. The rate of spread of these more transmissible or more dangerous variants is a concern. For example the Kent variant has spread to 45 countries, and the SA variant to 13 countries; the spread tends to be on major flight routes from London or South African airports respectively. These numbers of countries are underestimated due to lack of sequencing capabilities. A recent discovery of a hybrid of two variants raises the threat that hybrids could combine dangerous characteristics of two variants. The occurrence of mutations, and emergence of variants and hybrids are unpredictable and are likely to increase and prolong the impact of COVID-19.

3.4 **Vaccination Issues:** Successful vaccination of the world human population is essential to a) ending this pandemic and b) decreasing emergence of dangerous new variants by reducing the total amount of replicating virus. There will be, therefore, a race between vaccinating the world population and more dangerous variants emerging (see above). Vaccines will be modified to cope with emerging variants. However, each modification vaccine will take months, leaving populations more vulnerable to COVID-19. Successful world vaccination will likely require repeated

vaccinations and take years before outbreaks and spread are suppressed enough not to impact on levels of aviation.

3.5 Vaccine hesitancy in some countries is significant. This will take time to change, and may seriously slow the vaccination rate, enable further variants to emerge and hinder global recovery. Rates of adult vaccine acceptance (willingness to be vaccinated) are low <25% (e.g. Kuwait), intermediate (USA 59%, France 57%, too low for herd immunity) or high >90% (e.g. China) [10]. Until most of the world population is successfully vaccinated and virus levels suppressed, future planning of aviation should be cautious, because levels of travel may be unpredictable for many years, and aviation increases the spread of COVID-19 and its variants.

3.6 Effect of incoming passengers on COVID outbreaks: There is evidence that air travel has played a role in spreading COVID-19 around the globe. The death rate in the first COVID-wave was strongly correlated in 36 countries with the number of international arrivals in that country in 2018 [11]. The authors found a 3.4% increase in mean mortality rate for every 1 million arrivals in 2018, and concluded: “Very early restrictions on international travel should be considered to control COVID-19 outbreaks and prevent related deaths”. Long-term recovery world-wide may therefore require some air travel restrictions to curb spread of outbreaks caused by novel variants.

3.7 Future threats to public health. The Appellant has suggested in all their evidence that people taking more flights always brings economic and social benefits, but increasing passenger numbers also increases the risk of bringing infection into the country (Para 3.6). The pandemic has not surprised experts in public health and epidemiology. On the contrary, they have been expecting a pandemic. For example, one fear has been that an avian flu virus with high human death rates might mutate, enabling efficient human-human transmission and leading to a pandemic [12]. The likelihood of pandemics caused by zoonotic transference of viral infections to humans, and then from Human-Human, is increasing as the natural world is put under ever-increasing pressure, including effects of climate change such as altered seasons, drought, flooding and fire [12]. Outbreaks will not be limited to viral diseases but may include a wide spectrum of diseases [12]. To the extent that these are transmissible and spread around the world, they will have an adverse effect on airline passenger numbers and the desirability of flying.

3.8 For all the above reasons, we argue that the revised projections for passenger numbers at Bristol Airport are optimistic. The continuing impact of the pandemic and new variants has rendered the projections for recovery prepared in late 2020 unreliable. The world is truly in a ‘new normal’, and the implications of this for future expansion at BAL are explored in section 4 below.

4. Other Factors Influencing Future Demand

4.1 The pandemic has been a major event of this century, and it is beginning to emerge as a seismic point of social change in many ways. Working from home is likely to be undertaken by more people from now on for example. While an idea may spread with the speed of viral contagion, behaviours are much 'stickier'. It often takes an extreme event to bring about radical change. The COVID pandemic has provided a blueprint for rapid change of social norms and disproved the argument that it is impossible to change deep-seated habits quickly.

4.2 Parallels and links between the pandemic and the climate crisis are causing people to appreciate that changes they are making now are making a positive contribution towards reducing carbon emissions. A 2020 survey by CAST (Centre for Climate change and Social Transformations), measured intentions to fly for holidays and leisure post lockdown. While 40% of people plan to fly about the same amount as they did before, over 30% intend to fly a lot less, nearly 20% to fly a little less, and fewer than 10% planning to fly more. (1) There may well be a post-lockdown surge for a short while, but the wider social indicators are clear: people increasingly understand that flying using fossil fuels contributes to the climate crisis.

4.3 **The Tipping Point:** We are approaching a tipping point in attitudes to carbon-intensive transport. There is no uncertainty that it will happen, the only uncertainty is when. A rapid uptake of 'Net Zero' goals worldwide this year may be what does the trick. 'The wave of net-zero targets is a game changer because it changes everyone's thinking,' says Prof. Niklas Höhne of New Climate Institute (2). A social tipping point is when support for an idea crosses a threshold irreversibly – sometimes called a paradigm shift. A novel idea which starts small spreads like an epidemic, slowly at first then gathering speed exponentially. Once triggered it is difficult to stop. The tipping point is difficult to identify as it is happening, but can be seen clearly with the perspective of hindsight. The acceptance of drink-driving as a crime, or smoking in confined spaces as anti-social are examples. Attitudes to homosexuality in the UK since the sixties, when it was illegal, have since then undergone an about-turn to a point where society now allows same-sex marriage.

4.4 In 1938 a British scientist called Guy Callendar showed that between 1890 and 1935, the Earth had warmed by about 0.5°C Celsius, and that carbon dioxide levels had risen by 10% in this time, owing to the industrial revolution. He was not taken seriously. In the 1970s The number of scientific papers on global warming leapt from 2/3 a year to 20/30. By 2007 the IPCC had predicted a rise of between 1.8 and 4 degrees Celsius by the end of the century, and predictions continue to get more alarming. Acceptance among scientists is practically universal. This year, a People's Climate Vote conducted by United Nations Development Programme was the largest climate survey ever, with 1.2m respondents. 64% of people said that climate was an emergency. (3) In 2019 the School strike for Climate, David Attenborough and Extinction Rebellion protests persuaded the UK Government to declare a Climate Change Emergency and legislate for net zero by 2050.

4.5 **Flygskam**, or 'flight shame' is a movement that started in Sweden in 2018 and is gathering traction throughout Europe. The German word for it, Flugscham, was added to the Duden dictionary in 2020, and it was the FT's word of the year in 2019. At an airline summit in Seoul in 2019 Alexandre de Juniac, head of the International Air Transport Association (IATA) told some 150 CEOs: 'Unchallenged, this sentiment will grow and spread.'

4.6 Internal flights in Germany fell 12% in 2019, while rail travel increased (4). In 2019 Swiss bank UBS ran a survey of more than 6,000 people in the US, Germany, France and the UK. They found that 22% had reduced the number of flights they took over the last year. In 2020 UBS wrote: COVID-19 is showing countries what clean air means, how to cope without travelling, & how clean environments & healthier populations cope better with disease. We expect acceleration in shift from planes to high speed rail in Europe & China. (5)

4.7 The United Nations Climate Change Conference, or COP26, will take place in Glasgow this Autumn. It is likely that on the agenda will be action to deal with aviation emissions at an international level, which is the only arena where action is likely to be effective.

4.8 **Conclusion:** There is extensive evidence that attitudes to flying and the climate crisis are shifting towards a tipping point. The assumptions in the Appellants' projections of a rapid return to a pre-COVID normal, and from there ever-increasing use of aeroplanes for leisure trips into the future is not realistic. The future is a world where government commitments to zero carbon will tighten and carbon crisis impacts will intensify. People's behaviours will change, and to ignore this as a factor in future passenger levels and demand for flights is to deny reality.

5. Revised Forecasts for Future Airport Use

5.1 The 2018 planning application for expansion at the airport was accompanied by passenger number projections by Mott MacDonald (Planning Statement Appendix F) as follows:

Year	Low forecast (mppa)	Base forecast	High Forecast
2018	8.66	8.66	8.66
2020	9.12	9.53	9.56
2025	10.65	12.01	12.44
2030	12.24	13.36	15.47

mppa = million passengers per annum

The NSC Officer's report to committee felt that these estimates may be too high, and based this assessment of advice from independent consultants (page 16). Estimates of passenger traffic increase were then overtaken by the pandemic. Passenger numbers at BAL in 2020 were 2.2 mppa (BAL Operations Monitoring Report Jan2021).

5.2 Due to the collapse in passenger numbers due to COVID, York Aviation (YAL) were commissioned by BAL to prepare revised forecasts and submitted their report in November 2020. This recognises ongoing uncertainty due to COVID - but only in the short-term period of 2-4 years, and anticipates recovery to 2019 passenger levels between 2022 in the Faster Growth Case to 2023 in the Slower Growth Case (YAL report para 1.9 and Table 3.2) However, this report was prepared during summer 2020 when infection rates were low following the spring lockdown, and these short term forecasts are therefore over-optimistic.

5.3 Medium and Long Term Forecasts in the YAL Report: these are also presented as three forecasts: slower or faster growth, and a 'Core Case' mid-point.

The forecasts for passenger demands to 10 and 12 mppa are as below:

Slower growth:	10 mppa by 2028	12 mppa by 2034
Core case:	10 mppa in 2024	12 mppa by 2030
Faster Growth:	10 mppa by 2022	12 mppa by 2027

5.4 YAL's Monte Carlo forecasts. YAL's medium and long-term forecasts are based on a 'top-down' approach based on two main drivers: economic growth and modelled air fares. The modelled air fares are dependent on the following core building blocks: Fuel price and fuel consumption, Air Passenger Duty, Cost of Carbon, Average sector length in different market segments and average aircraft size and load factor in different market segments. (para 2.8 YAL Final Report Nov 2020 with Assumptions and Probabilities in Appendix A).

5.5 YAL's forecasts of UK GDP growth rate are spread across 9 different forecasts with differing probabilities. Four of these are equally top weighted at 15% (OBR Central, IMF Central, HM Treasury and OECD, all sourced from June 2020 reports. For 2021 these average out at a rise of

7%. These forecasts were all made when COVID infection rates were low, before the January lockdown and the subsequent downgrading of both short and medium term economic forecasts.

5.6 Fuel price has a direct impact on passenger fares and airline profitability. In Appendix A, the forecast oil price for 2021 ranges from a low of \$37 to a high of \$90, with the highest probability rating going to the YAL analysis of \$37. Brent Crude is currently trading well above \$60, partly driven by the huge increase in van home deliveries during lockdowns, and that leads us again to question the validity of these assumptions for medium term forecasting of passenger numbers in such volatile times.

5.7 Furthermore, the drivers in the Monte Carlo model are limited to financial and economic forecasting assumptions that may have worked reasonably well in the past to forecast increases in air passenger demand led by rising economic growth and the success of the low-cost airline model, but have no input from the radical societal and behavioural changes that we set out in Section 4.

5.8 For comparison with YAL's forecasts, the Airport Operators Association (AOA) published 'A UK Airport Recovery Plan' on the 3rd February 2021. This report projects three recovery scenarios to 2025 from the present 80% drop in demand ranging from an optimistic 100 % recovery to 2019 levels; a core projection of 90% of 2019 levels by 2025 or a low estimate of 70% of 2019 levels by 2025 (page 6: AOA report 2021). Their most optimistic forecast recovery is lower than the core forecast of the YAL report: 2019 passenger numbers at BAL were 8.9 mppa (YAL Report 2020), and the AOA report's most optimistic assessment is that recovery could reach this level in 2025. Furthermore, the AOA report states that

'even if global vaccine roll out goes well, it could be 2025 before airports see 2019 levels of passengers again. The renewed lock-down and additional travel restrictions are not yet included here and would produce a significantly more pessimistic outlook for 2021 and medium term recovery'.

5.9 The AOA's own caveats, as well as evidence that the COVID effect on air travel is likely to last some time, suggests that their core projection is likely to be optimistic. The AOA report was prepared in autumn 2020, before the winter lockdown and before the full impact of the COVID variants were known. Travel restrictions and additional costs, such as tests for the new variants, may apply for many years, and would dampen the demand for overseas holidays, particularly for families. A leading medical journal has stated that:

'The end of the pandemic is only possible when vaccines that are effective against circulating variants are distributed equitably across the world.' (The Lancet 11.02.21)

5.10 If the AOA's projections are, by their own admission, likely to be too hasty in predicting a return to 2019 passenger levels, that it would be wise to use their slower growth prediction of 70% of 2019 levels by 2025. For BAL this would mean passenger levels would be 6.3mppa by 2025 (70% of 2019 passenger levels). Projecting on from this slower recovery suggests passenger numbers at BAL may not exceed the already permitted expansion of 10mppa before 2035.

5.11 There will be long-term effects of Covid that will dampen down the future demand for air travel even after 2025. It is highly likely that business travel has peaked and will never return to its pre-Covid level. The slower recovery of business travel is acknowledged to be likely in the Appellant's additional information (YAL Economic Impact Report 2020:para2.17).

These effects include the following:

- The pandemic has forced many to work from home and this will remain popular for many workers and their companies
- Virtual meetings further reduce the need to travel, and reduce costs.
- Climate change is now higher on the corporate agenda.

All these factors are self-reinforcing, and will only increase over time. (Scott Gillespie Business Travel News Europe. 1st February 2021). By 2026 these factors will play an increasingly powerful effect on dampening demand for air travel leading us to conclude that BAL may well not reach its current limit of 10 mppa within the current planning horizon.

5.12 Due to the uncertainty over the pandemic, the financial resilience of airlines, the impact of Brexit and the major changes in lifestyle and attitudes, it is unsurprising that many airports are cancelling or postponing their capital projects, including Heathrow, Gatwick, Paris CDG, Birmingham, Edinburgh, and Luton and London City. On 7 May, Morgan Sindall announced its aviation division had seen a "significant and immediate reduction in all current and future planned activity". Bentley said this reflected the new reality of the airport market. "There is a whole new ball game here," he says. "Nobody knows how this will pan out. There is talk of no return to 'normality' until 2024/5. Construction News, David Price 21.05.20

6. Premature and Unjustified Development

6.1 Premature development has a particular meaning in planning terms, and is generally related to a proposal being offered while policy is still being developed that could influence the acceptability or otherwise of that development proposal (NPPF paras 48-50).

6.2 Policy CS6 in the NSCS requires further amendments to the Green Belt at Bristol Airport to only be considered once “long-term development needs have been identified and exceptional circumstances demonstrated”. The proposed development in the Green Belt could be seen as a de-facto altering of the Green Belt boundary. It will certainly create ‘previously developed land’ and make further development on it easier to justify. The justification for Policy CS23 in the NSCS states that “additional development requiring consent beyond 2011 is expected to form the subject of an Area Action Plan or other development plan document”, and the justification for policy DM50 in the DMPLP repeats the preference of NSC for a policy document for future major development. This has not happened prior to the application being lodged with the local planning authority, so that there are planning reasons to consider the application premature.

6.3. We have presented evidence that the predictions offered by the appellant of a quick return to 2019 levels of airport use and then increased use rising as before are far too optimistic. The changed environment of a pandemic, the continued risks from infection and resurgence, and the likely contribution to disease spread by air travel, all suggest that a much more cautious approach is needed for predicting future increase in passengers. Greater awareness of the environmental damage caused by flying, coupled with a tightening of the requirements for carbon reduction also suggest that increase is likely to be much slower if it happens at all. Thus the application is premature in the general sense of the word, in that there is no proven need for the expansion proposed.

6.4 Passenger numbers in UK airports have fallen on average about 80% in the last year. This situation is likely to improve significantly if and when COVID restrictions are removed but using projections from the industry, we have shown that it is quite possible the currently permitted increase to 10mppa will not happen before 2035. In these circumstances, at this point in time, an application for further expansion with all its damaging impacts is not justified. These adverse impacts include increased carbon emissions, harmful impacts on local ecology, increases in traffic and air pollution and noise nuisance for local people with resulting health impacts.

6.5 Very special circumstances have not been demonstrated for this inappropriate development in the Green Belt, and in a situation where need for further expansion cannot be confidently evidenced there can be no special circumstances justifying development in the Green Belt. Similarly there can be no justification for setting aside the requirement to promote sustainable transport effectively and reduce carbon emissions.

6.6 In our opinion the adverse impacts of the proposed expansion were not outweighed by the claimed benefits prior to the pandemic. In these new medical, societal and economic

circumstances, where there may never be a need for the expansion proposed, the application is premature and not justified. The adverse impacts of the development cannot be weighed against claimed planning benefits of a further expansion in passenger numbers that may never happen. The planning balance now comes down firmly in favour of avoiding the dis-benefits of this development proposal, and the Inspector is respectfully requested to dismiss this appeal.

Witnesses

It is intended to call witnesses to address:

- Scientific evidence on the COVID pandemic
- Forecasting demand for air travel
- Planning including Green Belt and Planning Balance
- Societal change impacts on air travel
- Parking provision

Reference list for Section 3

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North Somerset Development Management Policies Part 1 (adopted July 2016)

Bristol Airport planning application 18/P/5118/OUT and supporting documentation including Environmental Statement; Parking Demand Study; Parking Demand Strategy; Planning Statement; Design and Access Statement.

Bristol Airport further information 20/P/2896/APP CON including York Aviation Passenger Traffic Forecasts and Economic Impact Assessment Addendum November 2020; Parking Demand Study update.