

## Core Strategy Publication Version Responses relating to the sustainability appraisal

Name	Respondent number	Do you have any comments on the Sustainability Appraisal?
<b>Mrs H Burn</b>	473697	<p>The Appraisal shows "that there is little strategic difference between having a policy locally and relying on the national policy" this is currently the Air Transport White Paper 2003. The PCAA believes that this approach is too narrow and avoids the necessity to consider the issues more widely. The planning application will only look at the increase in passenger numbers stated in the application rather than the cumulative impact of the effects of growth from expansion carried out under planning application 09/P/1020/OT2. The baseline for noise and traffic to and from the airport should be 2005 with 5.2 million passengers per annum. The Draft Master Plan was published 2005 outlining growth to 2030.</p> <p>CS23:1 Airport Emissions only shows data to 2020 whilst the Core Strategy runs to 2026. These figures are taken from the Airport Master Plan and have not been research by the Council so could be higher. These figures should be updated, extended until 2026 and show how the increase of greenhouse gases fits with the Climate Change Act 2008.</p> <p>The Appraisal states that "it is argued that growth at Bristol Airport would be less damaging than serving the regions demand for air travel via other, more distant airports". This view on leakage is misguided. Offering more flights from Bristol Airport (in order to prevent leakage) will actually induce more people to fly and generate higher emissions (particularly short-haul). This can be seen in the EKOS report commissioned by the South West Regional Development Agency "Informing Sustainable Aviation Policy for the SouthWest". The PCAA believes that no evidence on this point has been gathered by North Somerset Council. The Appraisal fails to state that the airport is predominantly a lesiure airport and that the volume</p>

	<p>of business travel could fall in future. The Tym Economic Impact Report gave figures from CAA surveys which showed reductions in business travel from 19.8 % in 2003 to 13.34 % in 2008 at Bristol Airport. The report continues that the business sector may further reduce to about 9.6% by 2019/2020.</p> <p>The economic benefits need to be reassessed to 2026. The York Aviation Report Page 72 commissioned by the Council for the airport planning application showed that Economic Impact Assessment was not robust due to the methodologies adopted and the use of out of date.</p> <p>The Core Strategy has accepted the airport's forecasts rather than taking into account the risks pointed out in the York Aviation Report Page 70. These are: Newquay, Exeter and Cardiff Airport might claw back customers from Bristol Airport Long haul flights might not be attracted to Bristol Airport.</p> <p>Slower growth would result requiring no further development. The Strategy has failed to give a no growth scenario or sought independent forecasts for the period to 2026.</p> <p>The Appraisal recognises that "the content of the policy is concerned with environmental protection, not economic growth, and the Core Strategy therefore sends contradictory messages about its priorities." It is therefore disappointing that CS 23 and the Sustainability Appraisal do not attempt to resolve this point. Inevitably, this will lead to controversy at the time of a planning application, with communities having to fight to protect themselves and the environment because their interests have not been sufficiently considered at the time of the Core Strategy.</p> <p>Summary Table CS23 shows little difference between the alternative options as the list of options does not include a realistic option of "no further growth" driven by much higher oil prices and/or constraints required by the Climate Change Act. The cost of carbon should have been included in the options and the PCAA request that this exercise is carried out.</p>
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<b>Environment Agency</b>	1020673	<p>North Somerset Council state that they cannot avoid development in flood risk areas as this would be detrimental to Weston super Mares economic viability. Therefore, the Agency would advise that Sequential Test details should be included justifying this development allocation process. For example, the Weston Airfield site is in Flood Zone 3 (Para 4.65) however, the Sustainability Appraisal only refers to a Sequential Approach and not a Sequential Test. The Sustainability Appraisal policy matrix (p.34) for flood risk appears to conflict with other policies. Priority objective 3.5 has a negative impact because of the Weston Airfield site. This again emphasises the need for North Somerset Council to justify development at Weston Airfield. It is realised that there is a mitigation strategy, however, the hierarchy is clear in respect of the approach to proposed development in flood risk areas. An audit trail will be required for the Examination in Public showing how each site has been allocated.</p>
<b>The Bristol Port Company</b>	1025793	<p>The Sustainability Appraisal Non-Technical Summary refers to "Major development at the Port.....assessed through subsequent planning documents"; What is meant by this? to what documents is reference being made? is it the reference to a Port Masterplan as per para 3.299 of the Core Strategy?</p>