

12 October 2020

Our ref: WIL2264 219357 (050)

SWORDERS
Agricultural Commercial Residential

Secretary of State for Transport,
Aviation, Policy & Reform
Zone 1/25, Great Minister House
33 Horseferry Road
London
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Rumwell Hall
Rumwell
Taunton, Somerset
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T: [REDACTED]

By First Class Post & Recorded Delivery

Dear Sir

RE: THE BRISTOL AIRPORT LIMITED (LAND AT A38 DOWNSIDE ROAD) COMPULSORY PURCHASE ORDER 2020 - OBJECTION

I write to object to the above scheme on behalf of my clients, Sir David Wills, Rupert Wills and Sandra Brown as **The Trustees of the Sir J V Wills Will Trust C/o [REDACTED]**, as owners of Plots 1 & 2 on the proposed scheme map.

The primary reasons for objecting are:

1. The proposed scheme is not in the public interest
2. North Somerset Council Planning Committee has refused the planning application for the proposed scheme.
3. Not all of the land in my client's ownership is needed for the proposed scheme.
4. The attempts made to acquire the land by Private Treaty
5. Impacts from Covid-19

Taking these points in turn, I would make the following points:

1. The proposed scheme is not in the public interest

Employment

The airport is already able to expand from 9 million to 10 million passengers per annum so can already enable the creation of more jobs through this expansion. It is not felt that the employment or impact on the economy this further expansion may create outweighs other concerns. However, redundancies are currently being made at the airport due to the effects of Covid-19.

Traffic/Highways

Public highway improvement is already needed in this area along the A38 corridor and surrounding routes in order to satisfactorily accommodate existing vehicle movements, particularly at peak times.



The proposed highway improvements do not adequately address accommodating a further 4 million passengers so this proposal needs to give greater consideration as to how to address the additional vehicle movements this would generate, particularly at peak times.

The majority of visitors to the airport travel by private car due to the lack of public transport links to any major settlements, which is also a major factor that should constrain the expansion of the airport. The further provision of public transport to the airport has not been suitably addressed within the proposal.

Environment

The noise and impact on air quality generated by the increase in aircraft movements would have a significant adverse impact on the health and wellbeing of local residents. In addition, the increase of greenhouse gas emissions generated by the proposal would exacerbate climate change and be in contravention of the Climate Change Act 2008 which imposes a duty to reduce carbon emissions.

For these reasons, it is therefore felt that the wider impact on the environment outweighs the narrower benefits of the expansion.

2. North Somerset Council Planning Committee has refused the planning application for the proposed scheme

Application reference 18/P/5118/OUT for the expansion of Bristol Airport was refused on 19 March 2020. Therefore, there are currently no grounds for issuing a compulsory purchase order. Until a scheme has been granted planning consent, the acquisition of land should not be authorised.

In making the decision to refuse the application, it was felt that the proposal was contrary to the following North Somerset Core Strategy 2017 policies:

- Policy CS1 – Addressing Climate Change and Carbon Reduction
- Policy CS3 – Environmental Impacts and Flood Management
- Policy CS10 – Transportation and Movement
- Policy CS23 – Bristol Airport
- Policy CS26 – Supporting Healthy Living and the Provision of Care Homes

It was also deemed to be contrary to Policy DM12 of the North Somerset Development Management Policies Sites and Policies Plan 2016 and the National Planning Policy Framework relating to Green Belts.

3. Not all of the land in my client's ownership is needed for the scheme

Only Plot 2 as identified on the proposed scheme map is required for the highway improvements proposed, yet a compulsory purchase order (CPO) is being requested over the area shown in Plot 1 also. The details of proposed usage as set out in the Statement of Reasons are not sufficient to justify



the owners being deprived of their freehold interest. Even if the CPO is approved, the land in Plot 1 should be excluded from the Order.

4. The attempts made to acquire the land by Private Treaty

Inconsistent approaches have been made on behalf of BAL to acquire the land. Offers have been made and then withdrawn with lower offers made in their place. The area of land to be acquired has altered over the course of negotiations without warning or justification and BAL has changed the agents negotiating on their behalf which has led to duplicated and protracted discussions. All of these factors have frustrated the ability to reach agreement.

5. Impacts from Covid-19

Paragraph 5.6 of the Statement of Reasons, makes a vague commentary on anticipated recovery in passenger numbers following Covid-19. This provides no concrete evidence as there simply is none. It is therefore completely premature to progress with a CPO based on pre Covid-19 passenger projections when growth will at least be delayed and may well be permanently suppressed. Even the Statement recognises that any application for CPO must be supported by up to date passenger projections that have regard to the major impact on the travel industry arising from Covid-19 and the concerns over airline travel experienced by many which is particularly acute in the South West, more than other regions, due to the aging demographic of the population and their increased vulnerability to such infections.

In July BAL announced the need for nearly 250 redundancies at the airport, highlighting the reduction in current passenger numbers, underlining that the request to expand at this time is unnecessary.

BAL note that the highway works are not required until 10mppa capacity is reached (Statement of Reasons – para 9.1). Whilst that had been anticipated in 2021 (para 5.5), even initial global passenger forecasts by IATA project that traffic will not return to pre pandemic levels by 2024 suggesting that Bristol Airport will not reach 10mppa until 2025. Thus, even by BAL's own evidence, this CPO, for works not required until 2025, is completely premature.

I trust the above provides suitable information to support my client's objection.

Yours faithfully

Lucy Back MRICS FAAV

Director

Direct Email: