

I am writing to you on behalf of the Lansdown Crescent Association regarding the appeal by Bristol Airport against the refusal by North Somerset Council to grant permission for a substantial expansion.

I have read some of the 13 documents submitted to the council as part of the appeal. Most are quite long, up to 200 pages, and very technical. Essentially this is to minimise the environmental effects of the proposal in terms of noise, pollution, health and wellbeing and disruption. The general tone of the main report suggests that it was not written by an independent authority. I shall pick on only a few of the very many details in their report.

The reasoning for submitting this appeal is based on the reduction in air traffic that has taken place as a result of the SARS-CoV-2 pandemic. They argue that whereas the original estimate for air passenger numbers increasing to 12 million passengers per annum (12mppa) was 2026, this number may now not be reached until 2030. They therefore include expected increases in electric vehicles in their calculations to infer a reduced amount of air pollution from cars visiting the airport. Such planning is fraught with difficulty and speculation. Even if the sale of new petrol and diesel cars is banned from 2030, the substantial majority of vehicles on the road will still be fossil fuelled at that time and beyond. It will be well beyond this before freight carriers, vans, lorries and buses are substantially electric.

Fundamental to my plea to reject this appeal is the effect on Bath residents. In our limited reading of their documents we can see no reference to Bath. They claim the changes to noise levels will be "small and insignificant" claiming that "Around 500 properties are forecast to be exposed to night-time air noise levels due to individual aircraft above the SOAEL* in 2030, at both the 10 million passenger cap (as currently permitted) and the 12 million passenger cap (as proposed)."

Thus they have in their assessment, restricted the radius of affected housing to the area immediately surrounding the airport. But as we know all too well, residents of Bath, especially Lansdown, are significantly and adversely affected by noise and pollution as things currently stand. There is no doubt that the noise level they have used to define significant sleep disruption is well above WHO Guidelines, especially as Bath is an otherwise quiet environment at night.

Sleep disruption due to noise is a significant hazard to long term health and wellbeing. Regular poor sleep puts people at risk of serious medical conditions, including obesity, heart disease and diabetes – and it shortens life expectancy. (<https://www.nhs.uk/live-well/sleep-and-tiredness/why-lack-of-sleep-is-bad-for-your-health/>) The report produced for the appellant quotes 45 decibels as the low level of noise disruption and has used this figure to assess the number of affected households. However the World Health Organisations's 2018 Environmental Noise Guidelines

(https://www.euro.who.int/__data/assets/pdf_file/0009/383922/noise-guidelines-exec-sum-eng.pdf) state:

"For night noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft during night time below 40 dB, as night-time aircraft noise above this level is associated with adverse effects on sleep." As far as we can tell, Bristol Airport has ignored this as they've used a higher threshold of 45dB. (The decibel score is logarithmic so 50 decibels has 10 times the power of 40 decibels).

The increase in passenger numbers from 10mppa to 12mppa is a 20% increase in flight numbers. The noise of each plane may not increase significantly but the increased frequency will certainly be noticeable and will impact on the health of residents in Bath through additional air pollution, noise and disruption to sleep. Even if the escalation of flight numbers takes a few more years the additional capacity will last forever causing detriment to Bath residents indefinitely. Thus the pandemic is really irrelevant and has simply been used to justify an appeal.

So let's remind ourselves of the important facts and figures:

a 20% increase in flights with one million passengers travelling to and from the airport each month: about 33,000 every day.

4000 night flights with no seasonal restrictions, averages 11 flights per night between 11.30pm and 6.00am. It's reasonable to assume that most of these flights will be in the spring and summer months so that could mean one flight every 15 minutes during the night.

In view of the above the claim that "overall there would be no significant adverse effects" is patently untrue.

The noise levels used to assess nuisance and sleep disturbance are not in line with WHO Guidelines

The SOAEL has been used as a clearly defined measure of a noise safety threshold. But this is not the case. See footnote.

Insufficient attention has been paid in this proposal and appeal, to the residents of Bath who are substantially affected by overflying and night flights. The justification for this appeal, the effect of the SARS-CoV-2, is irrelevant as all of the adverse effects are simply delayed by up to 4 years but will be with us forever.

Footnote

*SOAEL – Significant Observed Adverse Effect Level

1. This is the level above which significant adverse effects on health and quality of life occur.
2. 2.22 It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times. It is acknowledged that further research is required to increase our understanding of what may constitute a significant adverse impact on health and quality of life from noise.

