



**BATH RESIDENTS**  
Federation of Bath Residents' Associations

23 September 2019

Mr Neil Underhay  
Development and Environment  
North Somerset Council  
Town Hall  
Walliscote Grove  
Weston-Super-Mare  
BS23 1UJ

Dear Mr Underhay

**Federation of Bath Residents' Associations (FoBRA) – Objections to the proposed expansion of Bristol Airport (18/P/5118/OUT)**

The Federation of Bath Residents' Associations (FoBRA) is an apolitical organisation that is the main representative voice for about 5,000 residents in Bath. It is made up of 32 resident associations and six affiliate organisations that include the University of Bath.

FoBRA has noted and fully endorses B&NES's objection reference 19/01819/CONSLT that was submitted to North Somerset Council on 18 June 2019. While this important objection is made on highway grounds (traffic, parking, transport), it does not reflect the environmental effect of the proposed expansion in terms of the additional pollution and noise, principally at night between 23:30 and 06:00, of the 4,000 extra night flights per annum. 3,000 of these flights in the summer and 1,000 in the winter, averaging 11 flights per night, will disturb many local communities and residents, especially as the prevailing westerly winds mean that most aircraft overfly Bath.

Public Health England is also concerned about [under flightpath] sleep disturbance and in section 5.6 of the Planning Statement reference is made to the Noise Policy Statement of England (NPSE) which requires local authorities to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. This is noise that affects the quality of life of residents in local communities including those residents in Bath who live under the flightpath. The Planning Statement also identifies the measurement of air noise under two particular categories: Significant Observed Adverse Effect Levels (SOAEL) and Lowest Observed Adverse Effect Levels (LOAEL) and predicts a likely rise to only 350 SOAEL dwellings affected if the proposal to increase to 12mppa by 2026 if the proposed development is approved. This number is astonishingly low. What are the LOAEL figures? Indeed, it is disappointing that in paragraph 4.3.4 of the Environmental Statement it states:

*"... the increases in noise levels at the individual properties due to the Proposed Development are not considered to be significant."*

And it is hardly surprising therefore that in paragraph 5.6.13 the Planning Statement dismisses predicted increase in air noise concerns by summarising:

*"... the noise impacts likely to arise as a result of moving from a 10mppa scenario to a 12mppa scenario with the Proposed Development are predicted to be low or very low. The air noise assessment concludes that, considering the individual dwellings, the increases in noise levels due to the Proposed Development are negligible and therefore the effect is not considered to be significant."*

What about the thousands of dwellings under the flightpath? FoBRA recommends a reassessment of both SOAEL and LOAEL be undertaken.

And it's not just FoBRA who is concerned. Please re-read the 5349 compelling objections and comments, including those from thousands of residents and from more than 25 parish councils that are posted on North Somerset Council's planning portal; most object on similar grounds to ours.

It also should not be forgotten that Bristol, North Somerset and Bath & NE Somerset councils have each declared a Climate Emergency and are in the process of introducing measures to tackle environmental pollution, including a reduction of carbon aviation emissions, by 2030, and these should influence the validity of Bristol Airport's expansion plans.

Finally, FoBRA of course recognises that the airport already has permission to expand to 10mppa; this cap has not been reached and is unlikely to do so until 2021 at the earliest. We believe that the impact of 10mppa must be assessed fully before any additional expansion is agreed, especially the impact of night flights. FoBRA, like many other objectors, argues that the airport has reached its natural growth limits and 10mppa was capped for this reason, and recommends that a decision on this application is deferred until then.

Yours sincerely

***Nicholas Tobin***

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