

North Somerset Council
Development Control
Town Hall
Walliscote Grove Road
Weston-super-Mare
North Somerset
BS23 1UJ

Our ref: WX/2018/132503/03-L01
Your ref: 18/P/5118/OUT
Date: 28 November 2019

Dear Sir/Madam

DEVELOPMENT TO INCREASE THE OPERATIONAL CAPACITY OF THE AIRPORT TO 12 MILLION PASSENGERS PER ANNUM (LIST OF DEVELOPMENT PROPOSALS PREVIOUSLY SENT) AT BRISTOL AIRPORT, NORTH SIDE ROAD, FELTON, WRINGTON

Thank you for referring the additional information concerning the above, which was received 1 November 2019.

Following on from our letter dated 06 July 2018 providing a scoping opinion to the Environmental Scoping Report, and our response dated 29 January 2019 to the Outline application, the Environment Agency can make the following comments:.

We have reviewed the Environmental Statement and documents submitted referenced as part of the Planning Application 18/P/5118/OUT. In particular, these documents include:

- Non-technical summary
 - Planning Statement
 - Chapter 12 - Surface water and flood risk with appendices
 - Chapter 13 - Groundwater, and,
 - Chapter 19 - Summary of significant effects;
- and,
- Letter dated 30th October 2019 with subject "Development of Bristol Airport to accommodate 12 million passengers per annum: response to formal request for further information under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The Planning Application Environmental Statement fails to assess risks to Controlled Waters from the proposed development. In particular, the following points require clarification:

1. From our scoping opinion letter "Despite there being no surface water courses within close proximity to the airport, streams at the edge of Broadfield Down are maintained by groundwater base flow. Any development at the airport has the potential to impact on groundwater quality, which in turn could impact on surface waters. A statement to this effect should be included and the risk appropriately determined". The CEMP proposed to mitigate the risk associated with pollution

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would only cover construction activities. The summary Table 13.13 indicates the introduction of mitigation measures are required to minimise the potential for leaks and spills and limit their effects. Section 13.11 indicates “No additional mitigation measures are proposed”. This contradiction should be resolved. Impacts of activities during operational phase should be considered separately from matters to comply with the Environmental Permit. The Environmental Permit should not be considered as part of environmental measures to be implemented and to provide justifications for planning application.

2. Groundwater fed springs are supported by the recharge area from the proposed sites. They include headwaters to the following main rivers: Congresbury Yeo, Blackditch Rhyne and River Kenn, Land Yeo and Winford Brook upstream of River Chew. Detailed assessment of flow and Conceptual Site model have been undertaken for this site and should be used to inform the qualitative evaluation presented in Table 13.4. A more comprehensive list of receptor potentially impacted by the proposed development should be assessed. All the main rivers should be considered in the Environmental Statement and a full water interest survey should be undertaken to cover potential downgradient water users. There is no justification provided for the 1km, 2km buffer applied in the Environment Statement. The zone of influence from the Carboniferous limestone should be based on agreed Conceptual Site Model and is unlikely to be limited to the outcrop of the Carboniferous Limestone.
3. The airport should be designed so as to reduce the risk to water resources. The “incremental increase” and “experience to date” indicate risk to pollute groundwater are high. The assessment of the risk to “no change” is therefore not appropriate.
4. Paragraph 13.9.7 present Table 13.12 and indicate a level of effect of major/moderate or greater is of most importance to the decision-maker, and so these effects are generally considered significant. Paragraph 13.10.1 indicates Chelvey source has a very high sensitivity correctly as it is a regionally important water resources. Table 13.13 sensitivity for Chelvey Source is downgraded to high with no justifications. Similarly, the significance of a pollution of groundwater potentially affecting the Water Framework Directive status of groundwater or surface water bodies and the operation of a public water source of supply indicates the magnitude of change should be either high or medium. The results of the assessment presented in Table 13.13 is therefore inconsistent with the methodology presented. The mitigations measures presented should be commensurate with the significance of the risk during both the construction and the operational phase.

The above points need to be addressed and clarified, if you wish to discuss I can be contacted on the number below.

We have sent a copy of this letter to the applicant for information.

Please quote the Agency’s reference on any future correspondence regarding this matter.

Yours faithfully

Richard Bull

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cc Bristol International Airport, Wood Environment & infrastructure Solutions UK Ltd

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