



Mendip Hills AONB Partnership
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Neil Underhay
Development Management
Development and Environment
Post Point 15
North Somerset Council
Town Hall
Weston-super-Mare
BS23 1UJ

29 January 2019

Dear Mr Underhay,

**Outline planning application (with reserved matter details for some elements and some elements reserved for subsequent approval) for the development of Bristol Airport to enable a throughput of 12 million terminal passengers
Bristol International Airport, North Side Road, Felton
(18/P/5118/OUT)**

With reference to the above application, comments from the Mendip Hills AONB Unit as follows:

The application proposes development of Bristol Airport to accommodate 12 million passengers per annum. Although the application is in outline, approval for landscape, visual and ecology mitigation masterplan, landscape management plan, noise mitigation plan and lighting design strategy is sought by the applicant as part of this application. The proposed development comprises several components, including:

- Extensions to the terminal building on its west and southern sides and a canopy over the forecourt of the main terminal building.

- Erection of a new east walkway and pier with vertical circulation cores, pre-board zones and a five metre high acoustic timber fence.
- Construction of a new service yard directly north of the western walkway.
- Car parking including erection of a multi-storey car park (MSCP) providing approximately 2,150 spaces (Phase 3) and wind turbines atop, extension to the Silver Zone car park to provide approximately 2,700 spaces (Phase 2) and year-round use of the existing Silver Zone car park extension (Phase 1).
- Surface access improvements including junctions with Downside Road and West Lane and an improved internal road system with gyratory and internal surface car parking.
- Enhancements to airside infrastructure including construction of a new eastern taxiway link and taxiway widening (and fillets) to the southern edge of Taxiway GOLF.
- Operational changes including retention of an annualised cap of 4,000 night flights between the hours of 23:30 and 06:00, albeit with the removal of the current limits on the number of night-time flights during the British Summer and Winter Seasons respectively, and revisions to the use of aircraft stand numbers 38 and 39 so that they operate under the same terms as stands 34-37.

The recent North Somerset Local Plan 2036 Issues and Options Document (September 2018), highlights that Bristol Airport proposes to double permitted air traffic to accommodate 20mppa by the 2040s.

The nationally protected landscape of the Mendip Hills AONB covers 198 square kilometres from Bleadon in the west to Chewton Mendip in the east. The AONB lies to the south-west of the wider Bristol area, south-east of Weston-super-Mare and to the south of Bristol Airport. The Countryside and Rights of Way (CROW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also covered by the 'duty of regard'.

The concept of 'setting' is often used to describe the area of land within which activities or changes could affect the associated AONB. The Government's Planning Practice Guidance draws attention to the concept of 'setting' and the Section 85 duty to AONBs stating that: 'The duty is relevant in considering development proposal that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.' (PPG, Natural Environment (Landscape) section, paragraph reference ID 8-003-20140306). Development outside of an AONB is capable of affecting the AONB and as such, the potential for effects on the AONB special qualities and distinctive characteristics are a consideration.

The Mendip Hills AONB Partnership produced the Mendip Hills AONB Management Plan 2014-19 as required by the CROW Act on behalf of the joint local authorities (adopted by North Somerset Council, Bath & North East Somerset Council, Somerset County Council, Sedgemoor District Council and Mendip District Council) and is a material consideration. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the

special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity and these include views from the Mendip Hills AONB, retaining dark skies and a sense of tranquillity and a landscape enjoyed by people for a range of quieter activities due to the tranquillity of the area. To note that the draft Mendip Hills AONB Plan 2019-2024 is currently in the final stages of preparation with adoption proposed by the joint local authorities within the next couple of months. Text relating to the impact of Bristol Airport is set out within the draft Mendip Hills AONB Plan 2019-2024 as follows: *‘Development pressure on the AONB comes from many sources, including proposals within the setting of our northern boundaries for significant housing growth that will bring the urban area closer to the edge of the AONB, proposals to double the capacity of Bristol Airport to accommodate 20mppa, increasing road traffic, and recreational use, and with the potential to impact on the special qualities that create the sense of place, and identity of the Mendip Hills AONB.’*

As set out in Natural England’s National Character Area (NCA) profile for the Mendip Hills (141), the area is *‘renowned for its tranquillity and inspirational qualities ...’* The NCA further recognises that *‘Light pollution from development threatens the extent of the recognised dark skies and out-of-character development is a continuing risk to the essential nature of the area.’* Within the NCA Statement of Environmental Opportunity under SEO1 it sets out *‘Safeguard inward and outward views and to the distinctive hill line and conserve and enhance the special qualities, tranquillity, sense of remoteness and naturalness of the area’.*

Within Natural England’s NCA profile for Bristol, Avon Valley and Ridges (the area in which the Bristol Airport is located), it sets out that *‘The planned expansion of Bristol Airport may significantly impact on the tranquillity and traffic of this NCA and the adjacent Mendip Hills NCA.’* The NCA further highlights that *‘Bristol airport significantly impacts the tranquillity south of Bristol, and beyond the boundaries of the NCA.’*

The National Planning Policy Framework 2018 (NPPF) highlights under paragraph 172 that *‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.’* The recent DEFRA 25 Year Environment Plan sets out under paragraph 2.2.1 that *‘Some of England’s most beautiful landscape and geodiversity are protected via a range of designations including National Parks and Areas of Outstanding Natural Beauty... Over the next 25 years we want to make sure they are not only conserved but enhanced.’*

Bristol Airport

Bristol Airport and development proposals to accommodate 12 mppa are considered to be within the setting of the Mendip Hills AONB. Planning permission was granted in 2011 to facilitate the growth of air traffic to 10 million passengers per annum. The Airport is visible from a number of key open access viewpoints across the Mendip Hills AONB such as the hills overlooking Blagdon and the wider area, Burrington Ham and Beacon Batch, impacting on the sense of remoteness and naturalness of the area. Air noise from flights into and out of Bristol Airport crossing the Mendip Hills AONB and its environs further impacts on the tranquillity of the area. Night time photographs taken from Viewpoints 16 (Burrington Ham) and 17 (Beacon Batch) both within the Mendip Hills AONB (Figures

accompanying the Landscape and Visual Chapter of the Environmental Statement), show lighting and sky glow from the Airport which is visible from both these viewpoints and impacts on the intrinsically dark landscape of the AONB.

The Landscape and Visual Chapter within the submitted Environmental Statement (Chapter 9) concludes under Table 9.10 that with reference to the Mendip Hills AONB, the magnitude of change proposed is '*negligible*' and significance is '*minor & not significant*'. It further sets out under the summary rationale that '*The Proposed Development could only potentially be seen in views out from approximately 14% of the 40% of the AONB that is within the study area. Site visits and baseline viewpoint photography demonstrate that views are available from a smaller proportion of the AONB and that in most views out Bristol Airport cannot be readily identified. The Proposed Development will be confined to the existing development footprint (with the minor exception of the Silver Zone car park extension (Phase 2)) and is of a similar height and scale as existing development. It is highly unlikely to be visible in views out of the AONB.*'

Bristol Airport is visible and identifiable from a number of viewpoints across the Mendip Hills AONB. Whilst the Landscape and Visual Assessment set out in Chapter 9 refers to the baseline (the existing Bristol Airport) in terms of the assessment, the proposals compound the current impact of Bristol Airport on the 'sense of place and identity' and special qualities of the Mendip Hills AONB. Longer term proposals for the Bristol Airport propose 20mppa and the impact of incremental development against the baseline of exiting development with the continued expansion of Bristol Airport will continue to erode the special qualities that give this nationally protected landscape its sense of place and identity.

The summary rational as relates to the Mendip Hills AONB within the Landscape and Visual Chapter continues that '*Tranquillity levels have the potential to be adversely impacted by the increased presence of aircraft movements over and close to the AONB as well as by the potential increased visual role of Bristol Airport. The proportion of aircraft movements that pass over the AONB is small and it is assessed that the limited proportionate increase will be insufficient to significantly adversely impact upon the varying baseline tranquillity levels. Many of the factors that contribute to tranquillity within the AONB will be unaffected by the Proposed Development.*' As identified above, a proportion of aircraft pass over the Mendip Hills, impacting on the tranquillity of the landscape and character areas including that of the sparsely populated and windswept plateau. Further increases to this air traffic will adversely impact on the tranquillity of the area. I note within the Bristol Airport draft Noise Action Plan 2019-2024 that '*Constraints on the airspace require some overflying of the Mendip Hills Area of Outstanding Natural Beauty below 7000 feet but our operational procedures includes a commitment to manage the flight paths so that the height of aircraft in this area is maximised.*' As confirmed within the Noise Action Plan, there is already some overflying of the Mendip Hills AONB due to constraints on airspace and it is unclear from the application documentation the impact of additional flights on airspace capacity and the further impact of this on overflying of the Mendip Hills AONB.

With regards to lighting, the Landscape and Visual Chapter within the Environmental Statement sets out that '*The highly limited nature of the proposed changes to baseline lighting levels as set out in the Lighting Impact Assessment and the adoption of a lighting*

strategy and design that prevents any upward lighting and minimises any light spillage will minimise the potential for changes to Bristol Airport's baseline contribution to lighting in the northern part of the AONB including dark skies within the AONB.' Within the Lighting Impact Assessment dated December 2018, paragraph 4.3.3 sets out that *'The Mendip Hills AONB and Dark Farmland to the South and East of the site. The sites most likely to affect the nearby AONB are the new east pier and the installation of lighting to the current and proposed Silver Zone car parks to the south of the site. The perception of the airport lighting will be increased due to the increased number of luminaires; however, this increase is seen as minimal and therefore acceptable. It is recommended that PIRs are fitted to the luminaires installed in the Silver Zone car parks, and retrofitted into the other southern car park areas, to ensure that the luminaires are only in operation when necessary. This will provide a beneficial perception difference to the airport lighting when viewed from the Mendip Hills AONB and dark agricultural land to the South and East of the site. Therefore, the effect of the extension proposals on the Mendip Hills AONB and agricultural land to the South and East of the site is deemed minor and acceptable'.*

Lighting and sky glow from the Bristol Airport is visible within the Mendip Hills AONB and this is a continued concern in terms of impact on the extent of the intrinsically dark landscape of the Mendip Hills AONB and the sense of remoteness and naturalness of the area. Paragraph 3.7.12 within the Mendip Hills AONB Management Plan highlights that *'Noise and activity arising from developments together with lighting can have an adverse impact on the areas tranquillity and dark sky. Mapping of light pollution has shown that the area of dark skies in the Mendip's is shrinking.'* This will further be impacted by Bristol airport expansion proposals and potentially significant residential development (proposals for 4,700 dwellings and infrastructure as set out within the Joint Spatial Plan) within North Somerset close to the Mendip Hills AONB northern boundary and within the setting of the Mendip Hills AONB. The cumulative impact of lighting from the development proposal together with proposed development as set out above, and impact on the Mendip Hills AONB needs to be considered.

Within the Environmental Statement, Chapter 6 Traffic and Transport sets out under Table 6.9 that in response to the issue raised of the cumulative impact of added traffic on the road network system passing through the AONB and the analysis sets out that *'The study area for this assessment has been based on areas where traffic flows are predicted to change by >5%, a more conservative value than the 10% change suggested in IEMA guidance¹² (10%). The modelled future traffic flows for 2026 have included committed developments and allocations included within the adopted NSC Local Plan. It is not predicted that traffic links within this AONB will experience changes in traffic flows of greater than 5% (links 1,2 and 3 are the closest links to the AONB and experience changes of <5%, changes are likely to lessen with distance from Bristol Airport) and therefore this has not been considered further within this assessment'.*

One of the issues impacting on the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape. As highlighted within Natural England's NCA, *'The planned expansion of Bristol Airport may significantly impact on the tranquillity and traffic of this NCA and the adjacent Mendip Hills NCA.'* Whilst modelled future traffic flow has considered committed development and allocations included within the NSC Local Plan, the modelling does not take into consideration cumulative impact

from development proposals for significant residential development and associated infrastructure within North Somerset in addition to proposals for Bristol Airport to accommodate 12mppa. The cumulative impact of the traffic from the development proposal together with proposed development (committed development and NSC Local Plan allocations) and significant residential development within North Somerset as proposed within the Joint Spatial plan and the impact on the Mendip Hills AONB needs to be considered.

As set out in our comments, we have strong concerns over the continued growth of Bristol Airport and impact on the special qualities that create the Mendip Hills AONBs sense of place and identity together with cumulative impact of development proposals on the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty.

Should you require any further information, please do not hesitate to contact the Mendip Hills AONB Unit.

Yours sincerely,

Cindy Carter
AONB Unit Landscape Planning Officer

cc Cllr Nigel Taylor, AONB Partnership Committee Chair; Natural England, Mendip Hills AONB Parish Representatives, The Mendip Society

The Mendip Hills AONB Partnership promotes and coordinates the conservation and enhancement of the Mendip Hills AONB