

Date: 28 November 2019
Our ref: 299674
Your ref: 18/P/5118/OUT



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Dear Sir/Madam

Planning consultation: 18/P/5118/OUT Bristol Airport Developments to increase the operational capacity of the airport to 12 million passengers per annum, Bristol Airport Limited
Location: Bristol Airport North Side Road Felton Wrington BS48 3DP

Thank you for your consultation on the above dated 01 November 2019 which was received by Natural England on the same date.

We have considered the further information submitted by Bristol Airport Limited and offer the following comments in relation to internationally and nationally designated sites:

Habitats Regulations Assessment/Appropriate Assessment

Natural England recently confirmed that the Council's HRA/AA conclusion that the proposed airport development will not result in adverse effects on the integrity of North Somerset & Mendip Bats SAC or other European sites is reasonable, providing all mitigation measures are appropriately secured in any permission given.

We are satisfied that the HRA/AA provided a thorough and systematic assessment of the potential effects of the proposed development on European sites, and we are generally supportive of the proposed conditions set out in *Part D Recommended Conditions*, which are relevant and clearly presented. That said, we consider conditions 1, 2, and 3, relating to the CEMP, mitigation and the LEMP respectively, would be strengthened by a clearer requirement for replacement habitats (on and off-site) to be in place and functional before development commences on site.

The airport proposals are complex with a variety of elements to be delivered over an extended period, and include components of the existing planning consent that are yet to be developed. The early phasing of ecological mitigation and replacement habitats, ahead of any loss or compromise of existing habitats, will be essential to ensure horseshoe bats populations are protected during and after the construction phase, and this principle underpins Natural England's agreement with the HRA/AA conclusions.

It also appears to be consistent with BAL's Response to Comments from North Somerset Council on Biodiversity Section 4 – Ecology:

Further information 3 - *BAL confirms its commitment to providing a suitable robust and enforceable detailed management plan and to the provision of replacement habitat before any removal of existing habitat commences.*

Further information 21 - *BAL can confirm that it will deliver the offsite replacement horseshoe bat foraging habitat as specified in the ES in advance of losing any existing foraging habitat associated with Silver Zone Phase 2 and the A38/Downside Road Woodland, together with managing and enhancing the retained area of the A38 Downside Road Woodland and further woodland enhancement/tree planting beyond the A38 and in Cornerpool Wood.*

Should the Council be minded to grant consent, Natural England would expect to approve final details for the creation and management of the off-site replacement habitat, which will need to include a robust monitoring regime and mechanisms for identifying any remedial measures.

Mendip Hills AONB

BAL has provided further information in response to Natural England's concerns about impacts on special qualities of the Mendip Hills AONB, which states that noise levels at the AONB are very low and that any increase in noise associated with the proposed development and including increased aircraft movements would be extremely small, less than 1dB(A).

While noise in itself may be unlikely to be a significant issue in relation to the AONB, we also recognise that it is very difficult to judge the significance of potential impacts on the special quality of tranquillity, which relates to how people perceive the landscape. That said, any increase in flights over the AONB or in airport related traffic within or close to the AONB will affect tranquillity and we would encourage you to ensure that traffic modelling, transport plans and monitoring arrangements take account of the AONB so that every effort is made to direct traffic away from the AONB to more sustainable routes.

Natural England recognises there are wider environmental implications to an increase in air travel, particularly climate change. We do not have the technical expertise to comment on the contribution to climate change from the airport expansion, but would expect this important issue to be given very careful consideration by the Council when determining this application.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact me on 07900 608311.

Yours faithfully

Amanda Grundy
Wessex Team