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My Reference: 99/18/00336/SBH
Your Ref: 18/P/5118/OUT
Being dealt with by: Mr S J B Harper

Date: 25 January 2019

Dear Sirs

Town and Country Planning Act 1990 (As Amended)

Proposal: Consultation from North Somerset for application 18/P/5118/OUT

Location: Bristol Airport

Applicant: Bristol Airport Limited

Thank you for the opportunity to provide comments on the above-mentioned application relating to the growth of Bristol Airport, and specifically to support growth to 12mppa. We provide the following response in accordance with our scheme of delegation and with the approved planning policies of the Council.

Sedgemoor District Council (SDC) is very glad to be engaged with North Somerset Council (NSC) the Airport and partners on the Bristol South West Economic Link (BSWEL) project. We feel this is a key piece of work in supporting the airport and the wider regional plans in the short, medium and longer term and one that can deliver mutual benefits.

As you may be aware, there are ever increasing links between the airport and the Sedgemoor economy, not least through the M5 and the A38 corridor, but also through the EDF Energy / Hinkley C project, linked hotel chains and the emerging supply chain. The HPC supply chain will go on to serve the new nuclear new build market nationally and internationally in the coming decades and as an area we will also see the concurrent decommissioning of A and B stations.

We see these links continuing to evolve with the designation of one of the largest growth sites in the South West at Junction 23, as an Enterprise Zone. The 635-acre Gravity site sits within the Heart of The South West Local Enterprise Partnership (HoSW LEP) Enterprise Zone and delivery across the whole site for a mixture of major commercial and energy producing uses is likely to be expedited across the coming decade. The plans for the site include bringing major new corporate entities into the South West and connectivity to the airport will be vital to achieving the potential success of the site.

The strategy for the development of this site, and indeed other employment sites, are key to delivery of our economic development strategy ambitions and the overall Council priority of 'growth and infrastructure'.

The duty to cooperate is of course an important ongoing role between the respective authorities to consider planning and transport strategies. As Sedgemoor is at the northern edge of the HoSW LEP Area, we have a strong relationship to the wider Bath / Bristol region to our north, which we hope we can continue to build on and develop. The recent National Infrastructure Commission bid seeking an M5 Corridor study refers to Sedgemoor as a 'gateway' to the deeper South West.

This growing interrelationship is consolidated through the levels of planned growth in Sedgemoor over the coming decade, set out within our emerging Sedgemoor Local Plan to 2032. A Strategic quantity of that growth will be located near to Junction 22 and the A38 corridor, with strategic allocations for housing and employment growth in particularly close proximity to junction 22 around Burnham-on-Sea and Highbridge.

Turning to the detail of the application and the consultation, SDC supports the principle of a well-considered and phased approach to the growth of Bristol Airport, to the benefit of the regional economy and in alignment with the Government's Industrial Strategy and the Airports National Policy Statement. The proposal to undertake that growth on a phased basis will allow flexibility to respond to any changes in circumstances or to realign with emerging technologies and opportunities and we are eager to work with the Airport, NSC and other partners to realise the benefits that growth at the airport will bring. There are detailed elements of the proposals that we would also like to comment on, as follows.

Highways Impacts

In previous responses to the Airport's consultations on their plans, we have pointed out the importance of the A38 from Junction 22 of the M5 that provides the main access route from the wider South West. This route provides a key access point into the airport and the capacity and operational effectiveness of junction 22, and the A38 northbound, requires careful consideration as part of the proposed expansion at the airport. We note and welcome the planned improvements on the A38 in close proximity to the airport. We also note there are no new significant mass transit options proposed to serve the corridor, beyond Weston-super Mare.

The Council is disappointed to note that limited assessment has been made of the impacts on junction 22 or the A38 south of the airport within the submitted Transport Assessment (TA), which we had highlighted in earlier responses to the Airport. Of particular concern, and an area where we feel further engagement is required with Highways England (HE) and Somerset County Council (SCC), is the impact of the airport's growth on junction 22 and the Edithmead roundabout on the A38, which provides direct access to that junction.

During the recent Sedgemoor Local Plan Examination process, HE provided a Strategic Road Network (SRN) Traffic Assessment. This report made use of a 2017 baseline (similar to the supporting TA) and when the Local Plan growth to 2032 was added it identified that it would lead to the formation of significant queues at Edithmead roundabout, particularly during the PM peak period. During the PM peak, the model showed a queue on the westbound approach to Edithmead roundabout extending back onto the northbound off-slip from the M5 and eventually onto the main carriageway itself. The level of congestion is such that stationary vehicles are found on the M5.

These conclusions were based upon an overall assessment of the wider network, including planned improvements at junction 23 and Dunball roundabout on the A38, in that location. The actual modelled increase in the PM Peak Hour flow through the Edithmead junction from the M5 was only a single vehicle (2,144 – 2,145). However, on the basis of this assessment the conclusion was drawn that an improvement to this arm of the junction is required to accommodate the forecast impact upon the junction.

In light of the above, and the assertion within the TA that there will likely be a further 61 vehicles passing through the junction during the PM peak (attributable to the airport growth), it is recommended that further assessment of the junction is undertaken. This is particularly important given that the emerging West of England Joint Spatial Plan is no longer promoting a potential new Junction 21A of the M5 that might have, in conjunction with improvements in the Banwell and Churchill areas, provided an alternative and improved access to the airport for traffic from the south.

SDC would be happy to work with the Airport and NSC, in collaboration with HE and SCC, in order to properly consider whether there is capacity to accommodate these movements and whether any mitigation is required. We would welcome an early discussion in order to ensure appropriate assessment of these junctions has taken place.

Biodiversity

Potential impacts on biodiversity arise from the extension of the Silver Zone car park and alterations to the A38. The proposals are likely to affect biodiversity locally, including a range of bat species, birds, brown hare, etc. without affecting species populations in Sedgemoor. The surveys undertaken appear to be appropriate and thorough and we would expect conditions to be attached to any consent by NSC in order to mitigate the effects on wildlife.

Of most interest to SDC would be the effects of the proposed development on the North Somerset and Mendip Bats SAC, which has component sites within the district, e.g. The Cheddar Complex, and the maintenance of the integrity of that site's designated features, principally horseshoe bats. In this context we anticipate a Habitats Regulations Assessment would be undertaken on the proposals by NSC.

We note surveys and assessment of effects on the horseshoe bats features were undertaken according to the technical guidance on the North Somerset and Mendip Bats SAC SPD (referred to in Appendix 11F). Both horseshoe species would be affected by the extension to the Silver car park and the A38 alterations but the amount of habitat replacement / enhancement proposed is more than sufficient to offset the value of that lost to horseshoe bats. This is likely to benefit greater and lesser horseshoe bats including in winter when foraging occurs in woodland, although the erection of bat boxes may encourage other bat species to hunt the same resource. It is therefore recommended that a bat activity survey of this woodland be undertaken to obtain a baseline against which the proposed management can be measured.

In conclusion, Sedgemoor District Council supports the planned growth of Bristol Airport in order to provide enhanced national and international connectivity for the region and for the benefit of the local and regional economy. We are though keen to ensure that the impacts of that growth are properly assessed and mitigated, where necessary, and want to continue to work positively with the Airport, NSC and other stakeholders in order to deliver the best outcomes for all parties.

I trust this is of use but please do not hesitate to come back to me should you have any queries at all.

If you wish to respond to this correspondence by e-mail please write to development.management@sedgemoor.gov.uk and quote the above application number.

Yours faithfully



Claire Pearce
Assistant Director - Inward Investment & Growth

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