

INTERNAL MEMORANDUM

FROM: MRS SUSAN THOMAS
(ENVIRONMENTAL PROTECTION)

Date Consultation Request Sent: 3/3/21

Development Control Case Officer: Neil Underhay

Application: Change of use of land from gypsy pony track/agricultural land to a Park & Ride car park for Bristol Airport with 3101 parking spaces and associated works

Reference Number: 20/P/1438/FUL

Location: Heathfield Park, Hewish

Formal comments from Susan Thomas regarding the above.

Thank you for consulting this service on the above application.

I have reviewed the Environmental Statement and other supporting information and it doesn't appear that the applicant has taken into account the information in the Scoping Opinion Decision (ref 20/P/2082/EA2). The document instead references only the screening opinion, 20/P/1697/EA1.

The scoping opinion said that NSC could not scope out any topics and stated that "*Where topics are scoped out during the preparation of the Environmental Statement (ES) prior to submission of the application, the ES should clearly explain the reasoning and justify the approach taken*".

The ES does not include any assessment of construction or operational effects on pollution (including noise and artificial light), air quality (including dust), pollution control or contaminated land, and there are no explanations giving the reasoning for scoping out these topics. Section 5 sets out the likely significant impacts of the development but only in respect of ecology and habitats. There is no explanation for other potential impacts normally included in an ES to have been scoped out.

Pollution

The Environmental Protection team would be concerned about the matters listed below, and since none of these are addressed either within the ES or separately, we are unable to recommend support for the application.

- Increases in **noise** due to increased traffic on the highway – this could arguably be scoped out if the traffic flow with development results in less than a 20% change in total vehicles or 10% change in heavy vehicles, but the applicant must show this.
- Operational **noise** from cars being moved around the site car doors slamming, bus engines idling, braking and engines revving etc affecting nearby dwellings including during the night. We recommend that this is assessed using the methodology outlined in BS4142.
- Construction (temporary) effects from **noise, dust, smoke, oil and fuel storage, and artificial lighting**
- Measures to address risks of contamination of the ground from **oil or fuel storage and risk of spills** and to prevent run off into offsite receptors including nearby watercourses and agricultural ground.
- The ES states in para 2.9 that the proposal will have a beneficial effect on **air quality** close to the airport but there is no air quality assessment to support this. We recommend that air quality should not be scoped out and that an assessment of the impacts on air quality at the site, and if claimed as a beneficial impact, at the airport should be submitted as part of the ES.

Artificial Lighting

A report on artificial lighting has been provided. This is a strategy rather than an assessment, and therefore no lighting impact assessment has been completed. The strategy does not consider the effect of lighting on dwellings near the site, which would be our concern. We therefore do not consider that the effects of artificial lighting have been fully considered. No plans have been provided demonstrating the effects of light spill. We would expect to see the following information:

- (i) details of the type and location of the proposed lighting;
- (ii) existing lux levels affecting the site;
- (iii) the proposed lux levels; and
- (iv) lighting contour plans,

As a result of the proposed use we would also expect any assessment to consider the effect of headlights as cars are moved around the site and to ensure that the site is appropriately screened to prevent light from headlights affecting any dwellings.

Conclusion

The absence of assessment of potential significant adverse effects from noise, construction dust/air quality, fuel storage and artificial light means that no mitigation measures have been identified and no conditions can be proposed.

There is insufficient information on environmental pollution including noise, air quality, dust, fuel and oil storage/spillage mitigation, and artificial lighting for the EP team to be able to recommend support for this application.

We therefore recommend that the application be refused on the basis that it does not comply with NSC Policy CS3: *“Development that, on its own or cumulatively, would result in air, water or other environmental pollution or harm to amenity, health or safety will only be permitted if the potential adverse effects would be mitigated to an acceptable level by other control regimes, or by measures included in the proposals, by the imposition of planning conditions or through a planning obligation”.*