

Expansion of Bristol Airport to 12mppa – Planning Appeal

PINS Ref. APP/DO121/W/20/3259234

Planning Application Ref.: 18/P/5118/OUT

ANNEX to

LANDSCAPE (Mendip Hills AONB and setting) PROOF of
EVIDENCE
for XR Elders

Christine Tudor

BA Hons, Dip LP, M Phil LA, CMLI, FRGS

XR/W5/2

June 2021

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5. Airport Outline Planning Application 13/5/19)



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West of England Joint Spatial Plan
c/o South Gloucestershire Council
Planning
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Bristol
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8 January 2018

Dear Sir/Madam,

West of England Joint Spatial Plan – Consultation

With reference to the West of England Joint Spatial Plan (JSP) consultation, herewith comments from the Mendip Hills AONB Unit.

The nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty (AONB) covers 198 square kilometres from Bleadon in the west to Chewton Mendip in the east. The AONB partly lies within the West of England Plan area to the south-west of the wider Bristol area and south-east of Weston-super-Mare. Areas of Outstanding Natural Beauty (AONBs) are some of the UK's most cherished and outstanding landscapes.

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 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 and the Plan has been adopted by North Somerset Council, Bath & North East Somerset Council, Somerset County Council, Sedgemoor District Council and Mendip District Council. 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, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.

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'.

The National Planning Policy Framework (NPPF) under paragraph 115 sets out that 'great weight should be given to conserving 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 landscape and scenic beauty.'

Specific comments as relates to the JSP draft policy and context as follows:

Chapter 4 Policy 2 Spatial Strategy and Policy 7 – Strategic Development Locations Site Requirements

The West of England JSP proposes a Spatial Strategy which includes proposals for around 1,900 dwellings at Banwell Garden Village and 2,700 dwellings at Churchill Garden Village in North Somerset and within close proximity to the Mendip Hills AONB. To enable these garden villages, significant transport and other infrastructure will be required. Transport infrastructure proposals include a new junction (21a) on the M5, delivery of the Banwell Bypass and onward link to the A38 though a new distributor route, improvements to the existing network and local bus services.

Information as to the costing of this transport infrastructure in addition to the other S106 infrastructure requirements and CIL to support the two proposed garden villages is not yet available, however within the consultation documentation it sets out that funding will be required to include alternative sources of funding to enable the proposed development. Initial viability testing based on broad assumptions as set out in the study by BNP Paribas, *West of England Joint Spatial Plan: An assessment of viability potential within the Strategic Development Locations* draws a question around the delivery of affordable housing at Banwell and Churchill Garden Villages in line with planning policy requirements and other planning obligations.

In addition to these proposals for 4,600 dwellings as set out above, a further 300 dwellings on land at Winscombe, Sandford and Churchill are proposed within the North Somerset Site Allocations Plan Proposed Modifications Plan. There is potential for further housing

development proposals adjacent to these settlements and surrounding rural areas as is evidenced from the number of residential development proposals outside of settlement boundaries recently put forward within this area on the basis of an absence of a five year housing land supply within North Somerset. The 300 dwellings are proposed within the next five years, with an indicative housing trajectory of housing delivery starting at Banwell Garden Village within 8 years and Churchill Garden Village within 9 years. Thus there are proposals for at least 4,900 new homes to the north of and within close proximity of the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty (AONB) within the timescales as indicated.

The proposed garden villages would be visible from the Mendip Hills AONB and have a significant impact on the special qualities that create the sense of place and identity of the Mendip Hills. Views from protected landscape at viewpoints such as iron-age fort of Dolebury Warren, along the Limestone Link (the long distance path joining the limestone of the Cotwolds to that of the Mendip Hills), the landscape character of the area and settlements along the spring line, retaining dark skies and a sense of tranquillity must all be considered.

There is strong concern that the proposed housing quantum and significant infrastructure to support the proposed development in such close proximity to the Mendip Hills AONB will have a significantly negative impact on the tranquillity, sense of remoteness and naturalness of the Mendip Hills AONB. There will be a cumulative impact on the road network system; 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. Views from the protected landscape towards the North Somerset Levels and Wrington Vale will be inextricably impacted and the landscape of the area and the settlements along the spring line will be changed to that of an urban edge with light pollution from development threatening the extent of the recognised dark skies.

Soundness

It is unclear how the SDL locations of Banwell and Churchill Garden Villages have been chosen using a sequential approach to ensure suitability, availability and achievability of site allocations in relation to other potentially more sustainable and viable locations, including those which have been previously considered.

As identified within the draft Joint Spatial Plan, there are four critical issues facing the region including ‘... a critical need to substantially boost the housing supply, particularly affordable housing of which the need is acute across the Plan area’ and ‘... development in some parts of the West of England has resulted in significant pressure on infrastructure and settlement patterns which are over-reliant on the private car’. As highlighted above, there are questions regarding the viability of the garden villages proposed at Banwell and Churchill and the delivery of affordable housing as required by planning policy and other planning obligations. Further, given the location of these proposed garden villages and analysis within the *Joint Spatial Plan Sustainability Appraisal* there are concerns as to the sustainability of the proposed development, pressure placed on the surrounding areas infrastructure and the reliance on the private car.

We would question the delivery timescales of the proposed SDLs of Banwell and Churchill Garden Villages given the significant transport infrastructure and other infrastructure requirements. This could undermine the JSP Spatial Strategy and five year housing land supply requirements which may lead to further speculative developments within other settlements along the boundary of the Mendip Hills AONB and further impact on the special qualities of the protected landscape.

Given the negative impact on the special qualities of the Mendip Hills Area of Outstanding Natural Beauty and concerns as set out above, we object to the inclusion of Banwell and Churchill Garden Villages as Strategic Development Locations within the West of England Joint Spatial Plan.

Chapter 4, Policy 5 – Place Shaping Principles and Proposed Vision for the West of England Joint Spatial Strategy

We welcome the inclusion of Policy 5 and supporting Policy Principle 4 to ensure the protection and enhancement of the natural environment together with highlighting that ‘These natural ... environments provide a wide range of services that benefit our economy ... providing health related benefits to our residents.’ Within text to support this Principle (paragraph 41) we would request that reference is made to the relevant AONB Management Plans and the Statement of Significance of the special qualities of the AONBs. Further, we would request that the ‘Proposed Vision for the West of England Joint Spatial Plan’ include reference to the importance and benefits of the natural environment within the surrounding countryside of the West of England to the health and well-being of all communities.

We are supportive of the development of an emerging West of England Green Infrastructure Plan and opportunities to link into the wider strategic GI movement networks within AONBs to encourage healthy lifestyles. We would welcome involvement in the development of the emerging document to support access to the Mendip Hills AONB, whilst ensuring that the impact on the inherent sensitivities, special qualities and character of the protected landscape are carefully considered.

Without prejudice to our comments on the Strategic Development Locations proposed at Banwell Garden Village and Churchill Garden Village as set out above, our comments on Policy 7.5 and Policy 7.6 as follows:

Chapter 4, Policy 7.5 – Banwell Garden Village

The development will be visible from the Mendip Hills AONB and have a significant impact on the landscape and the special qualities that create the sense of place and identity of the Mendip Hills AONB. Planning policy must ensure that residential development proposals are not granted planning permission until relevant transport infrastructure is delivered. There will be the requirement to ensure that not only does the development form and layout respect the sensitivities of the location close to the Mendip Hills AONB but any design principle documents and relevant master plans should include consideration of the protected landscape and the special qualities of the AONB. Views from and towards the Mendip Hills AONB should be protected particularly when considering the appropriate scale of the development, layout, design (including lighting) and landscaping. The impact

of development on the protected landscape and the special qualities of the Mendip Hills AONB would need to be carefully considered and supported by appropriate and acceptable mitigation measures.

Chapter 4, Policy 7.6 – Churchill Garden Village

The development will be visible from the Mendip Hills AONB and have a significant impact on the landscape and the special qualities that create the sense of place and identity of the Mendip Hills AONB. Planning policy must ensure that residential development proposals are not granted planning permission until relevant transport infrastructure is delivered. There will be the requirement to ensure that not only does the development form and layout respect the sensitivities of the location close to the Mendip Hills AONB but any design principle documents and relevant master plans should include consideration of the protected landscape and the special qualities of the AONB. Views from and towards the Mendip Hills AONB should be protected particularly when considering the appropriate scale of the development, layout, design (including lighting) and landscaping. The impact of development on the protected landscape and the special qualities of the Mendip Hills AONB would need to be carefully considered and supported by appropriate and acceptable mitigation measures.

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

We would wish to participate at the examination hearings as relates to the JSP Spatial Strategy and allocation of Banwell Garden Village and Churchill Garden Village as Strategic Development Locations.

Yours sincerely,

Cindy Carter
AONB Unit Landscape Planning Officer

cc Cllr Dawn Hill, AONB Partnership Committee Chair; Natural England, Banwell Parish Council, Winscombe and Sandford Parish Council, Churchill and Langford Parish Council, Mendip Hills AONB Parish Representative, The Mendip Society, The National Trust, The Cotswold AONB

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



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

23 July 2018

Dear Mr Underhay,

**Environmental Scoping Opinion to determine the scope of an Environmental Impact Assessment for a future application for the proposed expansion of the airport to accommodate 12mppa
Bristol International Airport, North Side Road, Felton
(18/P/3502/EA2)**

With reference to the above scoping opinion, herewith comments from the Mendip Hills AONB Unit.

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 Mendip Hills AONB Partnership produced the Mendip Hills AONB Management Plan 2014-2019 as required by the CROW Act on behalf of the joint local authorities and the Plan has been adopted by North Somerset Council, Bath & North East Somerset Council, Somerset County Council, Sedgemoor District Council and Mendip District Council. 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.

With reference to the Environmental Assessment Scoping Report by Wood dated June 2018, we note that the proposal is for an expansion of Bristol Airport to allow for an initial phase of growth of 12 mppa in the context of a wider Masterplan for development to enable growth to 20 mppa. The development proposals include extensions and alterations to the existing terminal building to optimise passenger facilities and processing areas together with the development of transport and passenger infrastructure and local highway improvements.

Scoping Comments

The scoping report includes reference to the special qualities that create the Mendip Hills sense of place and identity and we would highlight that in terms of these special qualities that the Environmental Impact Assessment includes consideration of effects upon views, dark skies (impacts of lighting) and tranquillity. The cumulative impact on the road network system will also need to be considered as 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.

The assessment should refer to the relevant National Character Area assessments including 141 Mendip Hills. Natural England's National Character Area (NCA) profile for the Mendip Hills 141 sets out that 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...' 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'.

With reference to Figure 7.4, we would suggest that viewpoints are also considered from the Iron Age hill fort of Dolebury Warren (SSSI and SM) and Burrington Ham (SSSI and SM), both of which are open access land. We would request a photomontage and night-time photography from Beacon Batch (viewpoint 8) and one additional viewpoint above. We would suggest that a viewpoint within the Chew Valley area also be considered and would refer the applicant to the Chew Valley Neighbourhood Plan.

We hope that the above comments are of assistance. 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*



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West of England Joint Spatial Plan
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7 January 2019

Dear Sir/Madam,

Joint Spatial Plan (JSP) – Additional Evidence Consultation

With reference to the JSP additional evidence consultation, herewith comments from the Mendip Hills AONB Unit. These comments are additional to our comments of 8 January 2018 in respect of the JSP.

The additional technical evidence base in support of the JSP includes a Consolidated Sustainability Appraisal dated November 2018 (WED009). From this document, we note the following:

Paragraph 2.11 sets out 'It should be noted that the SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability, ability to address local issues and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan'.

Chapter 5 of the Consolidated Sustainability Appraisal sets out the findings for the submitted West of England JSP, including for SA objective 4c (Minimise impact on and where appropriate enhance valued landscapes) as follows:

Paragraph 5.104 'Based on the SA findings for the Vision, Strategic Priorities and each of the JSP policies as shown in Table 5.4, along with consideration of the potential effects of housing allocations within the Local Plans, a significant negative effect on SA objective 4c is considered likely. The high level of development to be distributed through the spatial strategy (Policy 2) would result in development occurring at locations that have potential sensitivities in terms of landscape (including the AONB). While Policy 2 promotes the development of brownfield land it would also result in development taking place on a high amount of greenfield land which could adversely affect existing landscape character in the plan area.'

Paragraph 5.105 'Policy 6 supports the delivery of transport schemes in close proximity to the Mendip Hills AONB particularly by Banwell and Churchill, including a new M5 Junction, Banwell Bypass, Sandford/Churchill Bypass and capacity improvements to the A38/A368 junction. This policy also requires the delivery of green infrastructure to be incorporated as per the West of England Green Infrastructure Plan which may help mitigate adverse effects relating to landscape in the plan area. Further mitigation is likely to be achieved through Policy 5 given that the place shaping principles set out in this policy include the protection and enhancement of the natural environment. All SDLs are expected to have an adverse or uncertain impact in relation to landscape in the West of England considering the sensitivities of land at these locations. The effect is expected to be significant for nine of the SDLs given the increased sensitivities of these locations. Banwell Garden Village (Policy 7.5) and Churchill Garden Village (Policy 7.6) SDLs are noted to be in close proximity of the Mendip Hills AONB.'

Paragraph 5.106 'Allocations included in the unitary authorities' local plans are also likely to result in further loss of greenfield land which could have impacts in terms of landscape across the plan area. Furthermore allocations within North Somerset include those to the south of the unitary authority area which are in close proximity to the Mendip Hills AONB at Sandford, Winscombe and near Churchill. These sites may potentially have an adverse effect on the setting of this designation particularly in combination with the SDLs at Banwell Garden Village and Churchill Garden Village.'

Chapter 7 sets out conclusions to the Consolidated Sustainability Appraisal and includes paragraph 7.5 *'The SA has inevitably had to make assumptions in coming to judgements of the effects of the submitted JSP. The assumption with respect to effects, cumulative or otherwise, is on the basis of the intention of the submitted JSP (i.e. what it is trying to achieve). Past experience suggests that, when considering development proposals, there will often be tensions when applying different policies, and deciding where weight should apply. Despite the best intentions of planning authorities, it may not always be possible to deliver development that meets all policy criteria and good practice guidance, and difficult choices will often have to be made. This highlights the importance of monitoring the potential significant effects identified once the JSP is adopted.'*

It is unclear within the evidence base documents in support of the JSP, how the selection and rejection of strategic development locations (SDLs) has taken place to ensure a

robust, consistent and objective approach in the choice of SDLs to inform the Spatial Strategy. We note that within the Sustainability Appraisal Addendum Note April 2018 (SD9L) that reasons were given for the selection or rejection of SDLs in light of seven bullet point factors listed under paragraph 28. Paragraph 28 (SD9L) further set out that *'The JSP strategy reflects a balanced approach based on planning judgement. Rather than accepting or rejecting any particular scenario, the plan identifies those SDLs that had the most positive attributes.'* We note however that within the Consolidated Sustainability Appraisal dated November 2018 (WED009) under paragraph 14. it sets out that *'This SA Report (WED009) supersedes the previous SA documents listed above (this includes SD9L).'*

WED009 sets out that *'Factors such as public opinion, deliverability, ability to address local issues and conformity with national policy will also be taken into account by plan-makers when selecting referred options for their plan.'* It is unclear how these factors have been considered to ensure a robust, consistent and objective approach to the selection and rejection of SDLs. The SA is clear that there will be a *'significant negative effect'* on *'valued landscapes'* and it furthermore identifies that additional allocations at Sandford, Winscombe and near Churchill *'may potentially have an adverse effect of the setting of this designation particularly in combination with the SDLs at Banwell Garden Village and Churchill Garden Village'*.

The Mendip Hills AONB Management Plan 2014-2019 (adopted by North Somerset Council, Bath & North East Somerset Council, Somerset Country Council, Sedgemoor District Council and Mendip District Council) sets out under paragraph 1.4 a Statement of Significance on the special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity. The impact of the proposed SDLs at Banwell and Churchill Garden Villages on these special qualities, as outlined in our letter of 8 January 2018 is a strong concern. Paragraph 115 of the National Planning Policy Framework (NPPF) sets out that *'great weight should be given to conserving 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 landscape and scenic beauty.'* It is unclear within the evidence base documents in support of the JSP, how the selection and rejection of strategic development locations (SDLs) has considered and given *'great weight'* to the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty. The recent DEFRA 25 Year Environment Plan (2018) 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 (AONBs)... Over the next 25 years we want to make sure they are not only conserved but enhanced'*.

With reference to the Schedule of Proposed Changes (WED002), 7.5 Banwell Garden Village (WED004E) and 7.6 Churchill Garden Village (WED004F), we note that it sets out that the M5 J21a scheme is no longer required as an SDL mitigation however will be a longer-term scheme and that the construction of the Banwell Bypass prior to development will not be required. Proposed amendments to text set out in WED002 propose that *'Development requires the construction of the Banwell Bypass in conjunction with residential development...'* As highlighted within our previous comment, we have strong concerns that the proposed housing quantum and infrastructure of Banwell and Churchill SDLs will have a significantly negative impact on the tranquillity, sense of remoteness and

naturalness of the Mendip Hills AONB. We further highlighted within our comments that were Banwell and Churchill Garden Villages to be allocated, that policy must ensure that residential development proposals are not granted planning permission until relevant transport infrastructure is delivered. 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 national protected landscape. With the proposed amendments relating to transport infrastructure delivery, we have strong concerns that the above traffic issue will be exacerbated, significantly impacting on the protected landscape. How will development be managed to ensure that phasing supports a holistic and coordinated approach to wider outline development and infrastructure delivery, ensuring that piecemeal development does not take place and that delayed transport infrastructure delivery does not impact on the Mendip Hills AONB?

Within 7.5 Banwell Garden Village (WED004E) it sets out that *'The location is not within or immediately adjacent to the AONB, but the development and masterplanning of the proposal must consider the potential effect development will have within and adjacent to the AONB'* whilst 7.6 Churchill Garden Village (WED004F) further highlights that *'NSC must consider the potential effect development will have within the AONB and on land outside its boundary in accordance with national advice'*. Both documents then set out that *'It is considered that the specific location, form and layout of development as well as more detailed design considerations to follow, will be critical aspects in addressing any impacts'*. We would highlight that not only will the impact of the proposed development on the protected landscape need to be considered with regard to layout, form, design and landscaping, but also needs to consider the wider pressures from the proposed development particularly as relates to pressures from recreation and on the road network system. These considerations together with other impacts will need to be addressed.

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, Banwell Parish Council, Winscombe and Sandford Parish Council, Churchill and Langford Parish Council, Mendip Hill AONB Parish Representatives, The Mendip Society, The National Trust, The Cotswold AONB

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



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Neil Underhay
Development Management
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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



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

13 May 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)**

Thank you for consulting us on the further information provided in respect of the above application.

We reiterate our comments as provided in our letter dated 29 January 2019.

As highlighted, 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 of the Landscape and Visual Charter within the submitted Environmental Statement 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.

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

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