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Our ref: 268908
Your ref: 18/P/5118/OUT



Development Management
North Somerset Council
BY EMAIL ONLY
planningsupport@n-somerset.gov.uk
dmsscanningrequests@n-somerset.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

Planning consultation: Outline planning application (with reserved matters details for some elements included and some elements reserved for subsequent approval) for the development of Bristol Airport to enable a throughput of 12 million terminal passengers in any 12 month calendar period, comprising: 2no. extensions to the terminal building and canopies over the forecourt of the main terminal building; erection of new east walkway and pier with vertical circulation cores and pre-board zones; 5m high acoustic timber fence; construction of a new service yard directly north of the western walkway; erection of a multi-storey car park north west of the terminal building with five levels providing approximately 2,150 spaces and wind turbines atop; enhancement to the internal road system including gyratory road with internal surface car parking and layout changes; enhancements to airside infrastructure including construction of new eastern taxiway link and taxiway widening (and fillets) to the southern edge of Taxiway GOLF; the year-round use of the existing Silver Zone car park extension (Phase 1) with associated permanent (fixed) lighting and CCTV; extension to the Silver Zone car park to provide approximately 2,700 spaces (Phase 2); improvements to the A38; operating within a rolling annualised cap of 4,000 night flights between the hours of 23:30 and 06:00 with no seasonal restrictions; revision to the operation of Stands 38 and 39; and landscaping and associated works.

Location: Bristol Airport, North Side Road, Felton

Application No: 18/P/5118/OUT

Thank you for your consultation on the above dated 20 December 2018 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have considered the application details and offer the following comments:

Internationally and nationally designated sites – further information required

The application site is in close proximity to North Somerset & Mendip Bats Special Area of Conservation (SAC) which is a European site. The site is also notified at a national level as a series of Site (s) of Special Scientific Interest (SSSIs).

In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential

impacts that a plan or project may have¹. The [Conservation objectives](#) for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

Further information required

The consultation documents provided by your authority do not include information to demonstrate that the requirements of Regulations 63 and 64 of the Habitats Regulations have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.

In advising your authority on the requirements relating to Habitats Regulations Assessment, it is Natural England's advice that the proposal is not necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England advises that there is currently not enough information to determine whether the likelihood of significant effects can be ruled out. We recommend you obtain the following information to help you to undertake a Habitats Regulations Assessment:

- Details of the replacement habitat area, including creation, management and monitoring requirements
- An assessment of potential effects (positive and negative) on Goblin Combe SSSI

The main impacts of the proposed development on horseshoe bats are identified as the loss of 3.73ha of poor semi-improved grassland and scattered scrub habitats to accommodate the extension to the Silver Zone Car Park, and the loss of 0.16ha of broadleaved woodland adjacent to Downside Road to enable A38 Highway Improvements.

Greater and Lesser horseshoe bats were recorded at every automated detector location across the study area and the activity threshold (indicating bats are using the habitat for both foraging and commuting purposes) was exceeded for both lesser and greater horseshoe bats in all but one of the survey locations, including the A38 highway improvements area and the Proposed Extension to the Silver Zone car park (Phase 2).

The potential for significant effects on the Bats SAC to occur as a result of the proposed development has been recognised by the applicant, who sought Natural England's advice in relation to the North Somerset and Mendip Bats Special Area of Conservation (SAC) and the requirements of the SAC Guidance on Development SPD at the pre-application stage.

In principle Natural England is satisfied that the proposal to provide replacement habitat to off-set the loss of habitats or features of value to bats that cannot be retained as part of the development proposals is acceptable, subject to further details of the area in question. We also broadly support the suggested 'elements/aims' for the SAC/SPD Ecological Management Plan, as described in chapter 4 of the 'Outline SAC/SPD Ecological Management Plan for North Somerset and Mendip Bats SAC SPD Species and Wider Biodiversity' document, which we agree could be positive for horseshoe bats.

The proposed replacement habitat is adjacent to Goblin Combe SSSI and there may also be opportunities to secure positive and mutually beneficial long term management for both sites; however Natural England is not sufficiently familiar with the land in question to confirm with sufficient certainty that the site is suitable as replacement bat habitat or that the potential for adverse effects on Goblin Combe SSSI can be ruled out.

We suggest a site visit will need to be undertaken by Natural England SSSI adviser(s) to gain an

¹ Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.

The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

understanding of the proposed habitat replacement site to determine its current and potential value to horseshoe bats and to enable Natural England to advise on felling/creation works and suitable management and monitoring requirements. That said, we would expect optimal management of the replacement habitat for horseshoe bats would involve the introduction of cattle grazing, which would also off-set the loss of grazing at the airport.

We note the final package of SPD Replacement Habitat will be agreed with North Somerset Council and Natural England and we would be pleased to discuss the details of this in due course.

Mendip Hills Area of Outstanding Natural Beauty – further information required

An area of outstanding natural beauty (AONB) is land protected by the Countryside and Rights of Way Act 2000. It protects the land to conserve and enhance its natural beauty. Section 85 of the Act places a duty on public bodies to have regard to the purposes of AONBs in performing their functions. National policy also requires that great weight should be given to conserving landscape and scenic beauty.

The LVIA considers the Mendip Hills AONB and identifies the special qualities most vulnerable to any changes generated by the operation of the Proposed Development as: Views out including across the Severn Estuary to Wales and the Somerset Levels and the Somerset coast; the retention of dark skies and a sense of tranquillity; and a landscape enjoyed by large numbers of people for a wide range of interest and outdoor pursuits that benefit from areas of tranquillity.

The LVIA considers the current baseline for the Mendip Hills AONB and suggests, in paragraph 9.10.8 *The infrequent and limited visual role that is played by built components at Bristol Airport means that they have minimal impacts upon the varying levels of tranquillity within the AONB. Perceptual influences upon tranquillity can also be impacted by the movement of aircraft taking off and landing at Bristol Airport. The effect pathways are visual and aural i.e. seeing and hearing aircraft. The site visits confirm that aircraft movements are visible in northern views from some open locations within the AONB. It was also observed that during the day time, the movements of aircraft landing and taking off could not be heard within the AONB. During the night time site visit to the AONB, no aircraft movements were observed or heard. Review of the current Operations Monitoring Report shows that only aircraft movements on one of the three easterly flight routes are routed above the AONB. The Report shows that easterly flight routes only account for twenty percent of the aircraft movements at Bristol Airport. Hence it is deduced that aircraft movements associated with the operation of Bristol Airport have only a limited impact upon levels of tranquillity within the part of the AONB within the study area. This deduction is supported by the absence of any mention of an adverse influence upon tranquillity being played by the presence and operation of Bristol Airport in the current AONB Management Plan or in the Dark Skies in the Mendip Hills AONB statement.*

The assessment of predicted effects and their significance on the Mendip Hills AONB for Operation Phase Years 1 and 15 is summarised in paragraph 9.10.12 *The landscape assessment concludes that the operation of the Proposed Development has the potential to have adverse effects upon three of the AONB's 12 special qualities at either Operation Phase Year 1 or Year 15. Any potential changes to the composition of outward views; dark skies and levels of tranquillity will be small-scale and incremental and, as such, are unlikely to be discernible. The effects pathways identified will result in any changes being sustained for a small proportion of the part of the AONB in the study area which is only 40% of the total area of the AONB. As a nationally designated landscape, the AONB is accorded a high landscape sensitivity but the assessment concludes that the magnitude of change across most of the AONB will be none with a negligible magnitude of change in some of the more open and elevated parts. In accordance with the approach to significance evaluation set out in Table 9.9, a negligible magnitude of change combined with a high sensitivity receptor results in a conclusion of a minor level of landscape effect which, although adverse, will be not significant at either Operation Phase Year 1 or Year 15.*

Natural England acknowledges that views of the airport from the AONB are distant and limited to northern open areas, it therefore appears reasonable to conclude that the degree of change at the airport itself is unlikely to result in *significant* impacts on views out of the AONB. However the LVIA baseline of 'perceptual' impacts does not reflect our understanding of the existing impacts (visual

and noise) of aircraft flying over and within the setting of the AONB, which along with traffic movements, are already impacting on the *sense of tranquillity*. As such, we consider any increase in the frequency of aircraft using these flight paths could be significant and will require further consideration and, if necessary, additional mitigation.

We would be pleased to discuss this further, but would also encourage you to seek further advice from the AONB Partnership and AONB planning officer.

Environmental Net Gain

The 2018 National Planning Policy Framework (NPPF), includes a number of strong references to net gain including in relation to Transport Infrastructure:

102 - Transport issues should be considered from the earliest stages of plan-making and development proposals, so that...

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

This approach is also strongly encouraged by the Government's 25 Year Environment Plan and is currently the subject of a Defra consultation that proposes a mandatory obligation for development to deliver net gain.

In light of the current NPPF and the forthcoming Joint Spatial Plan priority on development providing a net-gain for biodiversity we would encourage your Authority to seek a net gain in biodiversity from this application.

Natural England supports the use of the Defra biodiversity metric as a tool to be used in conjunction with ecological advice to quantify biodiversity net gain in the terrestrial environment. It calculates before and after habitat value in terms of 'biodiversity units'. Natural England encourages the incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain.

Natural England is working to update the Defra biodiversity metric to take account of stakeholder feedback and we plan to release a new version (Defra Biodiversity Metric 2.0) in Spring 2019, accompanied by detailed guidance and a tool to apply the metric.

Other advice

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at [Wildlife and Countryside link](#).

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published [Standing Advice](#) on protected species. The Standing Advice includes a decision checklist which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us at with details at consultations@naturalengland.org.uk.

We would be happy to comment further should the need arise but if in the meantime you have any queries relating to the advice in this letter please contact me on 07900 608311.

Yours faithfully

Amanda Grundy
Somerset, Avon & Wiltshire Area Team