

North Somerset Local Plan 2039: Pre-submission Plan

Here is the link to the consultation.

<https://n-somerset.inconsult.uk/NSLP2039PreSub/consultationHome>

The plan relating to Bristol Airport has been submitted and the main sections SP7 Greenbelt and LP9 specifically relating to the Airport Greenbelt are outlined below.

Comments need to be made by 22 January. In essence a large portion of the Airport such as Silver Zone Carpark etc are built on Greenbelt. NSC are planning to remove that Greenbelt restriction meaning that Bristol Airport can build on Greenbelt without close scrutiny which could be of considerable detriment to the protection of landscape, wildlife such as bats and to those living in close proximity of the airport. **At no stage has the removal of Greenbelt been a part of the Airport expansion plans** and was not part of the Appeal. In addition, Section DP12 Development in the Greenbelt referred to in Section LP9 does NOT seem to feature within the plan (as far as I can establish by searching for it)!!!!

After Section LP9 please find suggested comments made by Cleve Parish Council. Please could CMPC consider a similar response.

SP7: Green Belt

The Green Belt in North Somerset will continue to check the unrestricted urban sprawl of Bristol, preserve the openness of land and meet the national purposes of Green Belt. In doing so it will protect rural settlements maintaining their character and separate identities.

Changes to the Green Belt made in this plan are a result of exceptional circumstances and will enable development at the following locations:

- Land north of Colliter's Way will be released from the Green Belt for residential development as defined on the **Policies Map**
- Land at Bristol Airport will be released from the Green Belt as defined on the **Policies Map**

Development of land released from the Green Belt will be required to demonstrate high sustainability standards and compensate for the loss of Green Belt. These requirements will be set out in the detailed allocations and planning guidance.

An extension to the Green Belt is proposed to the south of Nailsea as defined on the Policies Map to prevent the merger of Nailsea and Backwell and further encroachment into the countryside.

Villages in the Green Belt which do not contribute to openness will be inset from the Green Belt.

Opportunities to enhance the beneficial use of the Green Belt will be sought and supported provided they do not conflict with the purposes of the Green Belt or constitute inappropriate development.

Justification

Both Government and local people attach great value to the Green Belt. Releases of Green Belt land for development made in this plan are a result of exceptional circumstances. Land used for development will be kept to a minimum and will be expected to deliver high standards of sustainability, compensate for the loss of the 'green resource' by introducing innovative design for green spaces, wildlife habitats, street trees and sustainable drainage solutions as well as improve the accessibility and environmental quality of the remaining Green Belt.

The Green Belt is regarded as a multifunctional asset which not only carries out the traditional purposes set out nationally by maintaining openness and protecting land from inappropriate developments, it also ensures productive farmland and forestry, provides recreational and healthy lifestyle benefits to residents and visitors, a space to enjoy the beauty of the landscape, a home for wildlife and contact with nature and an environment to support the wider environmental and climate change objectives for reducing CO², flooding and air pollution. Opportunities to enhance these will be sought where possible. Land north of Colliter's Way has been identified as being appropriate for release from the Green Belt for residential use. The exceptional circumstances relating to the release of this land from the Green Belt are:

- The site's highly sustainable location and limited harm to Green Belt purposes as a result of its location adjacent to the Bristol urban area and bounded by the A4174 which forms a strong defensible boundary.
- The lack of sufficient capacity to meet housing needs at sustainable locations outside the Green Belt within North Somerset.
- The potential to be extremely well served by high quality public transport into Bristol with Metrobus extension and on a proposed mass transit corridor.
- The site is well located in terms of opportunities to encourage cycling into Bristol to access services, facilities and jobs.

Additional land at Bristol Airport has been released from the Green Belt to reflect the planning permission which was granted in 2022 to increase the operational capacity of the airport.

A new area of Green Belt will be introduced to the south of Nailsea and west of Backwell to ensure further encroachment into the countryside is contained and environmental and recreational benefits of the Green Belt are available to residents and visitors.

Other main policies in the plan containing relevant guidance:

- **Policy LP6:** Extent of the Green Belt
- **Policy LP9:** Bristol Airport
- **Policy DP12:** Development in the Green Belt

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Policy LP9: Bristol Airport

Within the Bristol Airport Green Belt inset as defined on the **Policies Map**, the development of facilities and infrastructure which contribute to sustainable improvements to operational efficiency and passenger safety at the airport and its role as a regional transport facility and major employer will be supported provided that:

- The proposed use requires an airport location. Changes of use to uses not requiring an airport location will not be permitted;
- The impacts of the operation of the airport and any new airport development on the living conditions of residents and the environment, including noise, water quality, air quality, visual and landscape impact, biodiversity and climate change, are adequately mitigated against;
- Appropriate surface access improvements including major public transport infrastructure (such as mass transit) are provided in step with development to mitigate the adverse impact of airport traffic on local communities and the highway network and facilitate a sustained modal shift to public transport;
- Proposals are accompanied by a surface access strategy with identified funding and trigger points;
- Improvements are made to the local highway network serving the airport including junction capacity, highway safety, footways and cycleways to mitigate the adverse impacts of airport operations;
- Benefits to the local economy and community are maximised; and
- Opportunities for renewable energy generation are maximised.

Justification

Bristol Airport is the eighth busiest airport in the UK and carried over 7.9 million passengers in 2022 and is a major employer in North Somerset.

In 2019, the UK Climate Change Act 2008 target for greenhouse gas emissions reductions was increased from at least 80% (from a 1990 baseline) to at least 100% by 2050. More than two thirds of local authorities in the UK have declared their commitment to help delivering the Net Zero Transition through declaring a climate emergency.

In 2021, the UK Government committed to formally include international aviation and shipping emissions in the targets set under the UK Climate Change Act, from the start of the sixth carbon budget (which covers the years 2033-37). It has separately committed to net zero aviation emissions by 2050.

Planning permission was granted on appeal in 2022 to increase the operational capacity of Bristol Airport from its cap of 10 million passengers per annum (mppa) up to 12 mppa together with the provision of an additional 3,900 car parking spaces, including revisions to the summer night flying limits.

Bristol Airport will be expected to define and deliver a low carbon, accessible, integrated, and reliable transport network, for both staff and passengers to access the airport when they need to and support the delivery of infrastructure that prioritises lower emission vehicles. The airport is also expected to limit the increase in demand for additional car parking provision.

The airport must also address the operational impact on the environment, such as air quality, noise and landscape impact. As well as impacts from aircraft, airports generate air pollution from a number of other sources including ground based power and heating, equipment to service aircraft, on-site vehicles and airport-related traffic on surrounding roads (staff, passengers and freight). Aircraft noise is a major environmental concern for communities impacted by aviation operations, particularly in relation to night time flights. Bristol Airport is expected to continue work in limiting night and daytime exposure to aircraft noise.

Airports also have an impact on biodiversity, including loss or degradation of habitats when further development occurs, and through the effects of light and noise pollution on some species.

This policy makes general provision for the management of future development at Bristol Airport by setting out the criteria for airport-related development within the Green Belt inset. The Green Belt inset has been increased to reflect the planning permission which was granted in 2022 to increase the operational capacity of the airport. Outside the inset, Green Belt policy applies where there is a need to demonstrate very special circumstances that outweigh the harm to the Green Belt and any other harm. Off-airport parking is dealt with at **Policy DP20**.

A Supplementary Planning Document will be prepared to provide detailed guidance on the approach to managing flying activities and development at the airport.

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Suggested answer to the following question as given by Cleeve Parish Council:

Question: *If you consider that the local plan is **not** sound, legally compliant or in compliance with the duty to cooperate, please provide details.*

HB's answer to the above question:

Cleeve Parish Council (CPC) object to The Plan. CPC believe it is not sound, legally complaint or compliant with the duty to cooperate for the following reasons:

Lack of Consultation on Policy LP9 and Policy SP2. Throughout the consultations on the preparation of the Local Plan there has been absence of policy preparation on Bristol Airport. Throughout this and previous

consultations, there has been no mention from North Somerset Council of removing the Green Belt on Bristol Airport.

No detailed Airport Master Plan: The removal of the Green Belt on the Airport played no part in application 18/P/5118/OUT which consented to growth to 12 mppa. No mention of subsequent removal of the Green Belt was made in the Bristol Airport Public Inquiry. The predicted growth to 12 mppa is expected in 2030 or later. The Airport can operate within the Green Belt until 2030 as evidenced by the planning application. This leaves a period of approximately nine years not covered by the Plan which should be covered by an Airport Master Plan. A detailed Draft Airport Master Plan was expected in late 2018 to show development to 2050. This has yet to materialise. CPC have no idea of what changes would be made on the South side of the Airport covered by Green Belt. For instance, what would be the height of buildings allowed in the area, would the lighting regime change close to the Mendip Area of Natural Beauty and how much noise would be created by changes to the Airport layout? North Somerset Council has allowed development already on the South side which harms landscape views in a rural area, such as the Lulsgate House application. Without the detail that a Master Plan would provide, it is impossible to make a judgement about the likely risks that might be created by the removal of Green Belt protection. Given recent experience, the risks are high and CPC therefore cannot support the proposed change in Green Belt.

'Your Airport: Your views': CPC knew from an earlier Airport consultation in May 2018 (with a document titled 'Your Airport: Your views, Towards 2050, Master Plan Consultation – Stage II Development Proposals and Options') that the Airport wishes to grow to 15 mppa and then 20 mppa. The document has a section titled 'Green Belt and infrastructure' which recognises the value of Green Belt and that exceptional circumstances are needed to develop in these areas. Yet CPC have no idea what development requirements are needed in the next phase of expansion or whether approval will be given due to the Climate Emergency and Biodiversity Crisis. Expansion of airports will be heavily dependent on new technologies being brought forward to meet their commitments enshrined in current planning conditions and Government policy. Removal of Green Belt protection weakens the position of NSC in putting pressure on the Airport to meet its commitments.

'No Green Belt Charter': Likewise, the Airport has not yet consulted the local community on its Green Belt Charter within the 'Your Airport: Your views, Towards 2050' document.

No Supplementary Planning Document: The Airport Policy LP9 states that a Supplementary Planning Document (SPD) will be prepared to provide detailed guidance on the approach to managing flying activities. A SPD was to be produced years ago but never materialised and CPC question whether it will again.

The Habitat Regulations Assessment: The HRA for the NS Local Plan shows that there may be significant effects from habitat loss and increase in air pollution. Habitat is of utmost importance to the Greater and Lesser Horseshoe Bats which are protected species. CPC note that currently Cogloop 2 (Silver Zone Phase 2 car park) remains within the Green Belt. CPC request that, at a minimum, Cogloop 1 (Silver Zone Phase 1 car park) is retained as Green Belt under the Precautionary Principle. It is simply unknown whether the mitigation for Cogloop 2, detailed in application 23/P/1637/FUL (Woodland Management Plan dated July 2023) will work. Many housing developments, for example application 17/P/1250/F and 16/P/1677/OTA, surrounding Bristol Airport are using the same Woodland for supporting species. The cumulative impact of these developments will not be known for years. Both car parks may have to revert back to green fields.

Removal of the Green Belt: Removing the Green Belt will make the land a brownfield site. In the event that a tipping point occurs and there is extreme, irreversible changes in the climate system and flying is reduced, the land may need to be returned to its original state which is more achievable if it remains Green Belt land.

Question: Please set out any modifications you consider necessary to make the plan legally compliant and sound, in respect of any issues you have identified.

My Answer:

The Airport should not be taken out of Green Belt. It is essential that the areas known as Cogloop 1 (Silver Zone Phase 1 car park) and Cogloop 2 (Silver Zone Phase 2 car park) should both be retained in Green Belt under the Precautionary Principle, in case of a crash in population of the Greater and Lesser Horseshoe Bats.

The preparation and consultation of the SPD within Bristol Airport Policy LP9 should be published for consultation before the Local Plan is determined in order that residents are informed of development proposals on the South side of the Airport in Green Belt. Please note that the SPD for the previous applications 18/P/5118/OUT and 09/P/1020/OT2 never materialised.

Meeting at the Airport attended by LVL on 5 December

Facts provided by Bristol Airport

- 9.7m passenger numbers 2023
- 3750 employees (no breakdown to full and part time)
- 83% flights for leisure and 17% for business
- 15 Airlines and 120 destinations
- Co-winner of the Eco Innovative Award 2022
- 2022 ACI Europe Best Airport Award jointly with Istanbul
- Third largest regional airport
- Lowest 4+ carbon accreditation
- 2.8 acres of solar panels.
- By 2027, 77% towards net zero excluding flights and will achieve this by 2030
- Currently 15% of passengers travel to the Airport by public transport. Plan is for this to increase to 17.5%.