

**Appropriateness of Provisions for  
i) Bristol Airport and  
ii) Portbury Dock**

**Bristol Airport**

*Context*

1. The planning of Bristol Airport is currently guided by:

(a) National policy, principally

- Air Transport White Paper (2003)<sup>1</sup> (NO/05)
- PPG2: Green Belts (NP/03)
- PPG13: Transport (NP/12)

(b) Regional policy

- RPG10 (2001) (RD/05)

(c) Local policy

- Joint Replacement Structure Plan (2002) (RD/01)
- North Somerset Replacement Local Plan (2007) (RLP) (SD/17)

2. The key issues that have emerged in the course of preparing the Core Strategy are:

(a) Planning process

(b) Green Belt

(c) Climate change

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<sup>1</sup> Including Progress Report (2006) (NO/05a&b). A change of direction was signalled by the scoping document, *Developing a Sustainable Framework for UK Aviation* (NO/05c) in March 2011 but the full extent of change remains speculative.

### *Planning process*

3. The Airport Master Plan (2006-2030) (LD/14) divided future development into two phases:
  - (a) Development to 2015
  - (b) Development 2016-2030
4. The scope of development to meet current needs has now been established through recent planning permissions for airport-related development generally<sup>2</sup> and for an on-site hotel<sup>3</sup>. The former of these is referred to below as “the current planning permission”. This development is planned to accommodate an increase in passenger numbers from 5.6 million passengers per annum (mppa) in 2009 to 10 mppa in 2019/20, though latest Department for Transport forecasts (NO/05d)<sup>4</sup> are that 10 mppa may not be reached until beyond the end of the plan period. This development was assessed in accordance with RLP Policy T/12. The focus of the Core Strategy is on long-term development that requires planning permission but does not yet have this. This distinction is made clear in paragraphs 3.291-3.292 of the Publication Version.<sup>5</sup>
5. Indicative plans for long-term development – to achieve the 12 mppa throughput envisaged by the White Paper – were set out in Chapter 12 of the Airport Master Plan. This accepted (para. 12.1) that, given the considerable uncertainty involved, there is likely to be little value in working up proposals in any degree of detail. The Master Plan includes (Drawing 13) an indicative 2030 land use plan for the current operational area and adjoining land in airport ownership. However, it acknowledges (12.30) that additional land will be required, totalling around 31ha.<sup>6</sup> The exact extent and location of the expanded facilities would be the subject of further detailed study when proposals for the 2030 expansion are brought forward (12.24). Car parking is the most land-demanding activity associated with the airport, other than the airside operations themselves, but assessments of car parking demand for the period 2015 to 2030 remain somewhat speculative (12.21).
6. In framing its approach to the future planning of the airport, the Council has sought to provide a strategic steer that is supportive of its role (Priority Objective 3), within the parameters of national policy, while identifying (Policy

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<sup>2</sup> Application reference 09/P/1020/OT2, granted permission 16 February 2011

<sup>3</sup> Application reference 10/P/1240/F, granted permission 22 October 2010

<sup>4</sup> *UK Aviation Forecasts* (August 2011)

<sup>5</sup> Proposed Change PC31 rearranges this text but does not otherwise alter it.

<sup>6</sup> The Master Plan states the operational area as 176 ha (para. 3.14), though the current permission covers a wider area. Para. 12.30 includes reference to a long-term requirement for 232 ha. This includes the 31 ha, 10 ha already owned at Cornerpool Farm and a further 15 ha not detailed.

CS23) the key spatial planning issues on which the formulation and consideration of proposals should focus. These issues are well-established as a result of the Replacement Local Plan (RLP) inquiry and the recent planning applications but now need to be rolled-forward so that they continue to inform airport-related planning work. Taken together, the objective and the policy provide a clear, concise vision for the Airport, within the context of national policy, supporting its economic role subject to the acceptability of development in environmental terms. They provide a suitable framework for future work: the idea that subsequent Development Plan Documents could be found unsound simply because they elaborate on the Core Strategy (rather than because they conflict with it) misunderstands the purpose of having these separate documents.

7. Whatever the merits of a more detailed policy, the detail does not yet exist. The Master Plan does not provide a mapped land requirement for long-term development and the Council does not have the resources to prioritise addressing this deficiency. Nor is this a priority for the Airport. There is much to be said for monitoring how the current phase of development is implemented and operated before commencing work on the next. At this date, crucial matters such as the long-term modal split for surface access, and hence the land requirement for car parking, cannot be reliably ascertained. The Council's approach has therefore been to defer decisions on detailed land use to an Area Action Plan (AAP) or other development plan document<sup>7</sup>, in conformity with the Core Strategy, which can be produced closer to the date when it is anticipated that permission for the long-term development would be sought. This approach would continue that of the Local Plan Inspector (at chapter 9, para. 46.10 of his report) (ED/27).
8. An alternative favoured by the Airport is to avoid any statutory process of forward planning and to rely solely on normal development management policies. This is not supported by the Council because, in contrast to an AAP, it would not enable community expectations to guide the planning process from an early stage. The AAP is expected to replace RLP Policy T/12, which addresses wider issues than simply the development of the airport: it includes the policy of restraining off-airport car parking, which is central to delivery of the surface access strategy and is therefore certainly not redundant. Reliance on generic development management policies would therefore fail to reflect the complex relationship existing between the airport site and wider strategies for land use and transport.
9. The recent planning permissions demonstrate the Council's commitment to support the airport's continued development. These decisions followed a rigorous assessment of the proposals, which in turn reflected several years of liaison, involving many disciplines, to develop the optimum solution. The

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<sup>7</sup> Nomenclature will be subject to any future legislative or national policy changes.

airport is a significant piece of infrastructure with significant local impacts and the policy approach should not underestimate their range and scale.

### *Green Belt*

10. Before adoption of the RLP in 2007, the whole of the airport operational area was washed over by Green Belt. The RLP created an inset north of the northern taxiway and east of Cooks Bridle Path, in line with the Inspector's recommendation (46.15-16 of his report). The Airport had argued at the inquiry for the whole of its land to be excluded from the Green Belt but this was not accepted by the Inspector. The distinction he recommended between the north side inset and the remaining land provided, and continues to provide, a powerful incentive to maximise the potential of the inset before looking to more dispersed forms of development.
11. The draft revised Regional Spatial Strategy for the South West (Secretary of State's Proposed Changes) (2008) (RD/02) proposed (in Policy HMA1) removal of the Green Belt at Bristol International Airport, having regard to the development needs of the airport. Para. 4.1.3 referred to the airport's development needs to 2030. Although it is no longer the Secretary of State's intention to proceed to issue the replacement RSS, the wording in this draft version has influenced the drafting of the Core Strategy, in respect of those issues not already resolved through the RLP. Policy CS6 recognises that a further amendment to the Green Belt at the airport would need to be subject to identifying long-term development needs (which can be seen as being to at least the end of the plan period) and demonstrating exceptional circumstances. As outlined above, long-term development needs have not yet been identified in a form capable of being mapped. In the absence of an issued replacement RSS, other exceptional circumstances would need to be demonstrated.
12. PPG2 (2.7) specifies other exceptional circumstances as those which 'necessitate' revision. There is currently no such necessity, at least ahead of providing for a long-term major development. Development to meet current needs has been approved and an amended Green Belt boundary would neither assist nor inhibit its implementation. Development ahead of a long-term major development would most likely be permitted development<sup>8</sup> or an amendment to recent permissions<sup>9</sup>. In the latter case, it is important that the same policy tests continue to be applied as to the original approval, in line with the Local Plan Inspector's reasoning for the creation of the inset.

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<sup>8</sup> Development permitted under the General Permitted Development Order, Part 18 (subject to no Environmental Impact Assessment being required)

<sup>9</sup> The main permission is in outline, with details of developments in the Green Belt reserved. Reserved matters can be submitted up to 8 years after the grant of permission.

13. PPG2 (2.1, 2.8) emphasises the permanence of Green Belt boundaries, a principle which frequent changes would devalue. The inset is defined so as to provide a framework for development up to 2020.<sup>10</sup> In its Position Statement (PS/205)<sup>11</sup>, the Airport suggests a new inset boundary which does no more than reflect the boundary of the current planning permission. The proposed inset is wider than both the operational area and the area to be developed under the planning permission but it would fail to accommodate development post 2019/20 as described in the Master Plan. Because it includes land in airport ownership but not currently proposed for development, its exclusion from the Green Belt would tend to prejudge the future direction of airport growth.
14. It appears from the Position Statement<sup>12</sup> that the Airport now wishes to focus on the current planning permission and not to commit itself to implementing the second phase of the Master Plan, to increase throughput to the 12 mppa figure favoured by the White Paper, within the plan period. The current planning permission is viewed as meeting its “long-term development needs”, which are, in its view, identical to its short/medium-term development needs. In this case, reliance can no longer be placed on draft RSS Policy HMA1, which was drafted on the basis of a quite different understanding of development needs at Bristol Airport, namely full implementation of the Air Transport White Paper.<sup>13</sup> If the current planning permission represents the limit of the Airport’s ambitions, no Green Belt change can be justified because no additional development will be sought and there are therefore no exceptional circumstances that could necessitate revision. The purpose of relaxing planning policy is to facilitate development, so where there is no more development to be facilitated relaxation serves no purpose.
15. The mere existence of the airport is not an exceptional circumstance: it has operated from its current site since 1957 and even after implementation of the current planning permissions much of the site will remain open land. The built elements of the current permissions are to be located predominantly within the inset. Surface car parking has taken place within the operational area under permitted development rights. There is no certainty yet that the development allowed in the Green Belt by the current permission will be implemented, or implemented without amendment. Other occupiers of land in the Green Belt could similarly argue for a change in status to provide additional flexibility.
16. Green Belt status has not prevented the development of the airport’s facilities. Some are covered by permitted development rights. Others have received planning permission because very special circumstances have been

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<sup>10</sup> Local Plan Inspector’s Report, ch. 9, para. 46.15

<sup>11</sup> Bristol Airport Position Statement on Issues 3a and 3b, Appendix D

<sup>12</sup> Bristol Airport Position Statement on Issues 3a and 3b

<sup>13</sup> Draft RSS, para. 4.1.3

demonstrated. Bristol Airport has one of the lowest land-takes of any UK regional airport.<sup>14</sup> The rigorous assessment process required by Green Belt status, initially for the whole airport and now for land surrounding the inset, contributes to this outcome. Unlike other regional airports of its size, which have urban fringe locations, Bristol Airport is located deeper into the countryside, posing specific challenges of visual impact and surface access that have implications for openness. If the airport is to continue to have an efficient, compact site, any alteration of its status should be underpinned by a no less rigorous assessment of long-term land requirements than previously.

### *Climate change*

17. The national policy approach to integrating climate change considerations into airport planning is set out in the Air Transport White Paper (paras. 3.35-3.43). On the whole, the approach is to rely on emissions trading to drive down carbon emissions. One scenario would see emissions in the aviation sector increasing while those in other sectors are reduced; a more challenging scenario would see aviation emissions reined in by improved technology. This approach is now supplemented by the Department for Transport's response to the Committee on Climate Change<sup>15</sup>, which suggests that there may be a role for promoting voluntary behavioural change, though there is no evidence on effectiveness. Voluntary behavioural change lies outside the scope of the planning system. The planning system has a role in minimising emissions from airport buildings, but not from flights.
18. Rising fuel costs – resulting both from climate change control measures and from the economics of supply and demand – could depress future demand for air travel. If there is such an effect, long-term development plans as envisaged by the White Paper may not be implemented. However, the Core Strategy seeks to make the required provision for assessing that development whether or not it occurs within the plan period. If it does not occur, no harm is caused by having a policy, whereas if it does occur but in a local policy vacuum, community aspirations would be more difficult to achieve. The relevant investment decisions will be made on commercial grounds and the Council cannot compel a particular outcome.

### **Royal Portbury Dock**

19. Priority Objective 3 and Policy CS24 set out the Council's aspirations for the Royal Portbury Dock area. The Dock area forms part of the Port of Bristol and benefits from permitted development rights<sup>16</sup> and so land in existing port

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<sup>14</sup> Airport Master Plan, para. 3.14 and footnote

<sup>15</sup> *Government Response to the Committee on Climate Change Report on Reducing CO2 Emissions from UK Aviation to 2050 (NO/05e)*

<sup>16</sup> Development permitted under the General Permitted Development Order, Part 17 (subject to no Environmental Impact Assessment being required)

use was not the subject of a site-specific policy in the North Somerset Replacement Local Plan (RLP). Policy E/6 of that Plan relates to the Court House Farm area, which is proposed for the expansion of port uses. There has been no planning application to bring this extension land into use.

20. The Court House Farm area, east of Royal Portbury Dock Road, was removed from the Green Belt by the RLP. At the same time, land to the west of the Dock area, separating it from Portishead, was added to the Green Belt.
21. The Inspector's report on the RLP<sup>17</sup> recommended that, in addition to Court House Farm, an area of land west of Royal Portbury Dock Road as far as Station Road, Portbury should also be removed from the Green Belt. This land is bisected by the A369 (The Portbury Hundred). As such, its development potential is highly constrained and the Bristol Port Company acknowledged this at the time of the Local Plan Inquiry (see plan labelled 'Appendix 5' attached). The land is also a designated Wildlife Site, as shown on the RLP Inset Map 37. The Inspector's recommendation was not accepted in full by the Council, only the Court House Farm area being removed from the Green Belt.
22. Draft RSS Policy HMA1 requires removal of the Green Belt between the Royal Portbury Dock and the M5 motorway, having regard to development needs of the Royal Portbury Dock. The Council is not aware of development needs that have not been met by the RLP allocation at Court House Farm. Future needs cannot reasonably be identified in the absence of a Port Master Plan that considers the complex as a whole, taking in land both north and south of the River Avon.

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<sup>17</sup> Ch. 7, paras. 50.105, 50.112, 50.119