

# **South Gloucestershire Core Strategy – FILTON AIRFIELD**



## **Supplementary Sustainability Appraisal Report**

**June 2011**

## **1 Introduction**

On 14 April 2011, BAE Systems announced its intention to close Filton Airfield in December 2012. This announcement comes at a time when the planning framework for development in South Gloucestershire over the next 15-20 years is being established through the Core Strategy Development Plan Document. This document is at an advanced stage and is shortly to be subject to independent Examination. The future of the Airfield site is a matter which the Core Strategy will need to take account of, and will be an issue for discussion at the Examination.

As a result of this the Council is issuing a Position Statement regarding the future of the airfield which sets out three strategic policy options for how the issue could be dealt with in the Core Strategy. Core Strategies are required to undergo Sustainability Appraisal (SA) to ensure that social, economic and environmental principles are fully taken into account during the plan's production. Therefore the options for the Core Strategy presented in the Position Statement must also be subject to SA.

This SA Report should be read alongside the following SA documents:

- Local Development Framework Scoping Report 2008;
- Initial SA Report 2008 – to accompany the Core Strategy Issues & Options document;
- Draft SA Report of the Pre-Submission Publication Draft Core Strategy March 2010; and
- SA Report to support the Submission Core Strategy, March 2010 with December 2010 updates.

These documents set out the requirements for Sustainability Appraisal and demonstrate how the Core Strategy has been informed by SA objectives to date. This SA should also be read alongside the Filton Airfield Position Statement, the Submission Core Strategy and the supporting evidence base.

## **2. Habitats Regulations Assessment**

Appendix 1 contains an addendum to the Habitats Regulations Assessment March 2011 that accompanied the submission of the Core Strategy. The addendum concludes that none of the three options for the airfield presented below would have a significant adverse effect on European sites of nature conservation importance.

## **3. Appraisal Methodology**

The matrices below in section 4 appraise each of the three options for how the airfield might be dealt with by the Core Strategy against the SA Objectives. These objectives were approved by the Council in 2008 as part of the LDF Scoping Report. The 3 options are:

- **OPTION 1 – No change to Core Strategy**

As the Core Strategy has made adequate provision for employment and housing, defer consideration of the development potential of the Airfield site until the Core Strategy is reviewed.

- **OPTION 2 – Add as a contingency site in the Core Strategy**

Recognise the Airfield as a contingency site in the Core Strategy that is suitable for development should additional land be required. This would enable the site to be available for infrastructure provision, but other development on the site would not be brought forward unless required.

- **OPTION 3 – Identify as a development opportunity in the Core Strategy**

Recognise the Airfield as a development site, in addition to the existing sites identified in the Core Strategy, and identify it for development that should be integrated with the Cribbs/Patchway New Neighbourhood. However, development would not proceed until sufficient community consultation and engagement with BAE Systems and other interested parties, as well as technical assessment, had confirmed the most appropriate development option for the site. The Core Strategy would set out a programme management style policy to establish the guiding principles for development.

Due to the high level and strategic nature of the options presented in the Position Statement, it is not the intention of this SA to appraise the options in detail. More detailed appraisal can be conducted in other Development Plan Documents as required. This is consistent with Regulation 12(3)(d) of the Environmental Assessment of Plans and Programmes Regulations 2004 which recognises that “*certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment*”.

#### 4. Appraisal Matrices

SA Objectives	Option 1 No change (no development)	Option 2 Contingency site	Option 3 Development opportunity site
<b>1. Improve health</b> 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	x✓	x✓	x✓✓
<b>Comments:</b> <ul style="list-style-type: none"> <li>• Option 1 could put pressure on Green Belt/greenfield sites as the Airfield would not be available for development if additional land was required. This could lead to a decrease in health at any Green Belt/greenfield locations if development were to take place there – e.g. loss of open space. However no development at the airfield may have health benefits for existing residents in close proximity to the site in terms of less traffic, noise, pollution and greater openness.</li> <li>• Options 1 &amp; 2 - Longer term objectives to integrate the Airfield (i.e. take comprehensive approach) at risk, as master planning of the wider surrounding area would proceed without the Airfield. Therefore any opportunities for health benefits through comprehensive masterplanning would be lost if development did not occur.</li> <li>• Option 2 means less pressure on Green Belt/greenfield sites, maintaining health benefits at those locations.</li> <li>• Option 3 allows extent of the opportunities for improving health to be worked up to ensure that they feature in emerging masterplans from the earliest opportunity. Less pressure on Green Belt/greenfield sites, maintaining health benefits at those locations. However development may have health disadvantages for existing local residents in terms of potentially increased traffic, noise and loss of openness.</li> </ul>			

<p><b>2. Support communities that meet people’s needs</b></p> <p>2.1 Help make suitable housing available and affordable for everyone</p> <p>2.2 Give everyone access to learning, training, skills and knowledge</p> <p>2.3 Reduce crime and fear of crime</p> <p>2.4 Promote stronger and more vibrant communities</p> <p>2.5 Increase access to and participation in cultural activities</p>	<p>1 xx</p>	<p>2 xx</p>	<p>3 ✓✓</p>
<p><b>Comments:</b></p> <p>There has been a high level of growth in the North Fringe of Bristol urban area over the past 30 years which has eroded the character and distinctiveness of the different communities in the area, and contributed to the general lack of a clear identity and sense of place around the area. These communities have also had to cope with social, community and physical infrastructure provision not having kept pace with the level of growth.</p> <ul style="list-style-type: none"> <li>• Option 1 - No development would bring disadvantages for existing local residents such as less potential provision of new local facilities or needed housing, including affordable housing. Potential for improving access to existing facilities is also prevented as the airfield would continue to act as physical barrier.</li> <li>• Options 1 &amp; 2 - Longer term objectives to integrate the Airfield (i.e. take comprehensive approach) at risk as master planning of the wider surrounding area would proceed without the Airfield. Therefore any opportunities for community benefits through comprehensive masterplanning and development would be lost.</li> <li>• Option 3 -allows the extent of the opportunities for community benefits, and improving access to existing facilities, to be worked up and fully incorporated into emerging plans from the earliest opportunity,</li> </ul>			

<p><b>3. Develop the economy in ways that meet people’s needs</b></p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>1 xx</p>	<p>2 x</p>	<p>3 ✓✓</p>
<p><b>Comments:</b></p> <p>Growth that is not supported by the necessary investment in supporting infrastructure and which significantly impacts on the environmental assets and characteristics of our communities is unlikely to deliver the intended economic benefits and may actually undermine not just these objectives being achieved, but the wider economic benefits being realised. The Core Strategy aims to strike a balance between the need to accommodate growth and supporting infrastructure, on one hand, and the need to protect community identifies and our highly valued natural environment on the other.</p> <ul style="list-style-type: none"> <li>• Option 1 – Lack of development would mean the site would not contribute to developing the economy.</li> <li>• Option 2 - Longer term objectives to integrate the Airfield (i.e. take comprehensive approach) at risk as master planning of the wider surrounding area would proceed without the Airfield. Therefore any opportunities for full economic benefits through comprehensive masterplanning and development would be lost. However economic benefits could be realised through Option 2 if development was required, but these may not be maximised by comprehensive planning from the outset.</li> <li>• Option 3 - Allows the extent of the opportunities for development of the economy including employment diversification, housing provision and enhancing the role of Cribbs Causeway to be worked up, all contributing towards the economy. Development must ensure the continued vitality of existing employers close to the airfield.</li> </ul>			

<p><b>4. Provide access to meet people’s needs with least damage to communities and the environment</b></p> <p>4.1 Increase choice of method of travel  4.2 Reduce the need/desire to travel by air  4.3 Help everyone access basic services easily, safely and affordably  4.4 Make public transport, cycling and walking easier and more attractive  4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>1 x✓</p>	<p>2 x✓</p>	<p>3 x✓✓</p>
<p><b>Comments:</b></p> <p>There has been a high level of growth in the North Fringe of Bristol urban area over the past 30 years and there are now around twice as many jobs as there are resident workers. As a consequence, there are significant in-commuting, traffic congestion and air quality problems. This congestion also affects the frequency and reliability of public transport.</p> <ul style="list-style-type: none"> <li>Options 1 &amp; 2 - the airfield acts as a physical barrier for movement through the communities of the Bristol North Fringe. Longer term objectives to integrate the Airfield (i.e. take comprehensive approach) at risk as master planning of the wider surrounding area would proceed without the Airfield. Therefore any opportunities for full transportation and access benefits through comprehensive masterplanning and development would be lost. However if no development (Option 1) were to occur then already significant congestion and air quality concerns in the North Fringe would not be added to (this would also apply to Option 2 if the site is not required).</li> <li>Option 3 allows the extent of the opportunities for increasing linkages between facilities and communities currently separated by the airfield to be worked up. However development could add to already significant congestion and air quality concerns should investment in infrastructure not be forthcoming.</li> </ul>			

<p><b>5. Maintain and improve environmental quality and assets</b></p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>1 x</p>	<p>2 x</p>	<p>3 ✓✓</p>
<p><b>Comments:</b></p> <ul style="list-style-type: none"> <li>• Option 1 puts pressure on Green Belt/greenfield sites as the Airfield would not be available for development if additional land was required. Environmental quality at those sites would therefore be at risk and this would represent an inefficient use of land.</li> <li>• Option 1 &amp; 2 - Longer term objectives to integrate the Airfield (i.e. take comprehensive approach) at risk as master planning of the wider surrounding area would proceed without the Airfield. Therefore opportunities for ensuring good comprehensive design, respecting existing views, etc would be lost.</li> <li>• Option 3 allows the extent of the opportunities for ensuring good design and respecting existing views and townscape to be worked up. No ecological or landscape value associated with the site, however several important views exist that should be incorporated into the design of any development. Development of the brownfield site represents an efficient use of land.</li> </ul>			

<b>6. Minimise consumption of natural resources</b> <b>6.1 Reduce non-renewable energy consumption and ‘greenhouse’ emissions</b> <b>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</b> <b>6.3 Minimise consumption and extraction of minerals</b> <b>6.4 Reduce waste not put to any use</b> <b>6.5 Minimise land, water, air, light and generic pollution</b>	<b>1</b> <b>x✓</b>	<b>2</b> <b>x✓</b>	<b>3</b> <b>x✓✓</b>
<b>Comments:</b> <ul style="list-style-type: none"> <li>• Option 1 – no natural resources would be used or pollution created if the site were not developed, however this should not override social need for adequate housing provision.</li> <li>• Options 1 &amp; 2 - the airfield acts as a physical barrier for movement through the communities of the Bristol North Fringe. Longer term objectives to integrate the Airfield (i.e. take comprehensive approach) at risk as master planning of the wider area would proceed without the Airfield. Therefore any opportunities for full transportation and access benefits, and resultant reductions in emissions, through comprehensive masterplanning and development would be lost.</li> <li>• Option 3 - Development itself represents consumption of natural resources, however Option 3 allows the extent of the opportunities for minimising pollution and the consumption of natural resources through removing the airfield as a physical barrier to movement to be worked up and incorporated into comprehensive masterplanning. It increases the potential and opportunity for renewable/ low carbon energy networks across the wider area and development of the brownfield site also represents an efficient use of land. Comprehensive master planning under Option 3 would enable the achievement of carbon reduction and climate change adaptation and mitigation while providing sufficient growth to meet existing and future residents’ needs and respecting landscape, heritage, biodiversity and environmental assets.</li> </ul>			

## 5. Conclusion

South Gloucestershire has experienced major development over the last 30 years. This has had and is continuing to have significant impacts on the quality of life – as seen by current high levels of congestion and erosion of community identity. South Gloucestershire Council fully understands the importance of economic growth and job creation to the wealth and social health of the District. However, we also consider that growth that is not supported by the necessary investment in supporting infrastructure and which significantly impacts on the environmental assets and characteristics of our communities is unlikely to deliver the intended economic benefits and may actually undermine not just these objectives being achieved, but the wider economic benefits being realised. The Core Strategy therefore aims to strike a balance between the need to accommodate growth and supporting infrastructure, on one hand, and the need to protect community identities and our highly valued natural environment on the other.

Each of the three options presented have a number of sustainability advantages and disadvantages. However the appraisal demonstrates that Option 3 – where the Core Strategy would consider the airfield as a development opportunity site to be comprehensively masterplanned with the adjacent Cribbs/Patchway New Neighbourhood – would yield the greatest sustainability benefits.

The greatest benefit resulting from Option 3 appears at this early stage to be the opportunity to remove Filton Airfield as a physical barrier to movement in the communities of the Bristol North Fringe. This would open up opportunities to encourage sustainable forms of transport as well as ensuring that sustainable design can be incorporated into the development from the outset.

## Appendix 1 – Habitats Regulations Assessment

European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (known as the 'Habitats Directive') provides legal protection for habitats and species identified as being of European importance. Article 2 of the Directive requires the maintenance or restoration of these habitats and species, in a favourable condition, and is achieved through the establishment and maintenance of protected areas referred to as Natura 2000 (N2K) sites, comprised of Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Sites designated as wetlands of international importance under the Ramsar Convention are subject to the same provisions as Natura 2000 sites.

Article 6(3) of the Directive requires any 'plan or project' likely to have a significant effect on a Natura 2000 site be subject to 'appropriate assessment'. This means an assessment of the impacts of the plan/project on the site. As 'plans', the Regulations require Local Authorities to carry out an appropriate assessment (Habitats Regulations Assessment or HRA) of local development documents before being adopted. The purpose of the assessment is to assess the impacts of a land-use plan against the conservation objectives of Natura 2000 Sites.

South Gloucestershire Council published the HRA of the Submission Draft Core Strategy in March 2011. Following an initial screening process, the HRA identified that the Core Strategy proposals had the potential to significantly affect three N2K Sites – the Severn Estuary SAC/SPA/Ramsar; Chew Valley Lake SPA; and Avon Valley Woodlands SAC. However, following an analysis of the likely impacts arising from individual policies, it determined that the Core Strategy was not likely to have any significant adverse effects.

Natural England indicated their concurrence with these conclusions and that they regarded the HRA 'fit for purpose' by letter dated 7<sup>th</sup> April 2011.

Since publishing the HRA of the Core Strategy the owners of Filton Airfield have announced the airfield's closure, prompting the need for the Core Strategy to recognise this and to plan a strategy for the area that takes the closure into account. Policy CS26 relates to the Cribbs/Patchway new neighbourhood.

Three options for use of the site have been identified and are strategically appraised in this SA:-

1. No change - the airfield is left derelict;
2. Contingency site if more land for development is required;
3. Development opportunity site, master-planned comprehensively with the Cribbs/Patchway new neighbourhood.

(1) - the 'no change' option - means no change to the quantum of development and Cribbs/Patchway new neighbourhood subjected to HRA within the Core Strategy, and thus no change to the conclusions of the HRA.

(2) and (3) alters the quantum of development in CS26 and the Cribbs/Patchway new neighbourhood as assessed within the March 2011 HRA Report.

The HRA concluded that the policies within the Core Strategy were unlikely to have a significant effect on Chew Valley Lake SPA, Severn Estuary SAC/SPA/Ramsar or Avon Valley Woodlands SAC, or compromise the conservation objectives of any of the N2K sites, either through recreational use, increased water usage or a deterioration in air quality (increased traffic), either alone or in combination with the policies and new neighbourhoods identified in the Bristol City Core Strategy. It is considered that, with the relative distances between the N2K Sites and Filton airfield, as well as the relatively small increase in the amount of development resulting

from incorporating the site into Policy CS26 for Cribbs/Patchway compared to the overall total for the new neighbourhoods within Bristol and South Gloucestershire, neither options (2) nor (3) in any way alter the conclusions of the HRA as published in March 2011.

The Council's preferred option is (3) for the Filton airfield site to be master-planned comprehensively as part of the Cribbs/Patchway new neighbourhood. This will be taken forward in more detail in the forthcoming *Sites, Policies & Places* Development Plan Document (SPP DPD), which in turn will be subject to its own HRA under the Habitat Regulations 2010.