

## Runway Approach Lighting Consultation

### Consultation response to Bristol Airport by Butcombe Parish Council

Butcombe Parish Council strongly objects to the proposal to install runway approach lighting and fencing on Felton Common for the 7 specific reasons set out below.

In addition, it seems extraordinary that this new proposal was omitted from Bristol Airport's 'Master Plan to 2040' that underwent extensive public consultation and was finally published less than 6 months ago. Had this significant proposal been included in the original Master Plan consultation, it is entirely possible that the wider public response to that consultation would have been rather different. Instead, as a single, stand-alone addendum consultation, with an inevitably lower public and media profile, fewer members of the local community will be appraised of the wider implications of this significant proposal to their future quality of life. This consultation document implies that the lighting and associated enclosure are now required because of changes to Civil Aviation Authority safety standards. It seems somewhat surprising that the extensive aviation expertise within Bristol Airport did not anticipate these changes for the 2040 vision set out at length in the Master Plan. It is also very unfortunate that this proposal has emerged *after* publication of the latest iteration of the emerging North Somerset Local Plan (North Somerset Council pre-submission Local Plan 2041, Reg 19) and so was not able to inform Policy LP12 on Bristol Airport. Butcombe Parish Council therefore asks that, in the interests of transparency, the full Master Plan consultation including this lighting proposal should be repeated and refreshed before the matter is taken any further as we consider this consultation to be compromised.

1. Felton Common represents a unique historical link to the ancient rights of commoners to benefit from use of common land and to the general public to access that land for a raft of purposes. These rights have existed for many hundreds of years and it would therefore be unconscionable to reduce these ancient public rights in the interest of facilitating short-term corporate commercial gain. If anything, Felton Common is now enjoyed more than ever before for recreational purposes by both the immediate local community and wider visitors from North Somerset and Bristol.
2. The 100 acres or so that make up Felton Common are a very important archaeological asset, containing many prehistoric mounds and barrows, two of which are designated as nationally important Scheduled Ancient Monuments. Given the Common's large expanse, and the lack of previous up-to-date and comprehensive archaeological investigation, it is likely that there are more - as yet undiscovered - important archaeological features that could be lost forever if part of the Common was removed.
3. Felton Common represents an important landscape feature, forming part of the Broadfield Down Settled Limestone Plateau. Limestone plateaus such as this functioned as unenclosed commons as far back as the medieval era but only Felton Common still survives ((see North Somerset Council's Landscape Character Assessment,

Supplementary Planning Guidance, September 2018). Felton Common is enjoyed as a composite *whole* landscape feature: a proposal to nibble away at its physical integrity with highly visible lighting and fencing would diminish it in a greater way than the bare bones of the proposal suggests. A visit to the proposed lighting site will show that it is to be placed on the higher raised area of the Common, and will therefore be extensively visible in the surrounding countryside. The Common also acts as a 'green lung' for the surrounding community, with its vegetation helping to mitigate the high level of carbon emissions already generated by the Airport, together with the associated airport traffic on the A38. To reduce this landscape feature and carbon sink in order to facilitate further disturbance and to generate more emissions from the proposed larger long-haul aircraft would go against accepted national and local planning policy. See key Policy 8c, National Planning Policy Framework, December 2024, and key Policies SP1 (Sustainable Development) and SP2 (Climate Change) in the North Somerset Council pre-submission Local Plan 2041 (Reg 19). With 8.5m columns and 3m fencing, we cannot accept the questionable contention in the consultation document that 'the sense of openness and views across the Common would remain...'.

4. Felton Common is a significant biodiversity resource containing remnant areas of unimproved calcareous and acid grassland of sufficient ecological importance for it to be designated as a Local Nature Reserve (LNR) and Site of Nature Conservation Interest (SNCI). Lighting and fencing would compromise the integrity of this LNR, which has been previously surveyed as including some 267 species of plants, 30 species of birds and 18 species of butterfly ('Felton Common' - Bridget Smith; pub February 2014). As above, the value of Felton Common is in its composite whole. Once parts of the Common begin to be compromised, its historical, archaeological and environmental value is incrementally degraded.
5. North Somerset Council's recreational aspirations reflect the overarching view of the general public, supported by national policy, about the crucial importance of maintaining high quality public open space for informal enjoyment as well as for mental and physical wellbeing. See Policies 103/104, National Planning Policy Framework, December 2024, and Policy DP52: Protection of Open Space and Recreation- North Somerset Council pre-submission Local Plan 2041, Reg 19. The Common is very well used by the local community, particularly by ramblers and dog walkers. The proposal to provide replacement land in mitigation on the fields (already owned by the Airport) between the Common and A38 is wholly unsuitable given those field's proximity to high levels of noise and pollution from adjacent heavy A38 traffic and the proposed larger long haul planes in the air above. Such a replacement proposal could not be less suitable. For recreational walkers and visitors on the proposed replacement land, the noise would be so great that ear protectors would be necessary, as Airport employees are required to wear within the operational boundaries nearby.
6. Butcombe Parish Council believe that the rural tranquility of the Common will be greatly diminished by the additional noise generated by the larger long-haul aircraft that will be permitted by this proposal and which will be descending to a lower altitude of 12.5m. This will impact on the local ecology, as well as the health and wellbeing of residents and visitors. Butcombe Parish Council does not believe that any mitigation can be

provided to negate the impacts of this increase in noise on the Common, particularly given the escalation in the frequency of aircraft movements resulting from the Airport's stated intention to further expand passenger throughput to 15 mppa.

7. Given Bristol Airport's unexpected need to already change its proposals from those previously set out in the Master Plan, which was only very recently published in July 2025, Butcombe Parish Council has no confidence that this proposal will not be followed by more alterations to the Master Plan that will similarly affect Felton Common, thus having the incremental effect of chipping away at the Common's integrity over time. If this first incursion by the Airport onto Felton Common is established, Butcombe Parish Council is extremely concerned that it will act as a 'trojan horse' precedent for further gradual encroachment of Bristol Airport infrastructure across this irreplaceable historic asset.

**For all the above reasons, Butcombe Parish Council wishes to register its objection to the proposal in the Runway Approach Lighting Consultation in the strongest possible terms.**

3 December 2025