

## Appendix H

### Sevenside

- 17.1 The Avonmouth-Sevenside area is a regionally significant employment location with considerable further economic potential. The Sevenside part of this area lies in the coastal zone between the Avonmouth industrial area (in the administrative area of Bristol City Council) and the village of Severn Beach. ~~It is~~ comprising an employment area of approximately 650 hectares which benefits from planning permissions granted to ICI in 1957 and 1958. It is currently a mix of industrial and former industrial areas and greenfield sites not yet developed. The M49 motorway bisects the area. Bristol Port lies at the southern end of the Avonmouth-Sevenside area. The capacity of this Port is to be enlarged with a deep sea container terminal.
- 17.2 Although the area has extant planning permissions there are a number of constraints which affect its development potential, including:
- national and international nature conservation designations relating to the Severn Estuary.
  - the risk of flooding from the River Severn due to breaching or overtopping of the existing flood defences, coupled with a rising tide level, as well as groundwater flooding;
  - the limited capacity of the existing highway network and infrastructure in the area; and
  - high archaeological interest in the Severn Levels.
- 17.3 The principal landowners intend to implement the extant permissions and develop warehousing and distribution centres. There is also interest in waste recovery and energy generation. There may also be some potential for waste recovery facilities (see West of England Joint Waste Core Strategy Submission document, available separately) and for power generation. SITA intends to develop a waste to energy facility, and Scottish Power has indicated its intention to promote a Combined Cycle Gas Turbine (CCGT) Power Station on the former Grow How site at Saltmarsh. This proposal would be ~~considered~~ considered as a major infrastructure project to be ~~determined~~ considered by the Infrastructure Planning Commission or its successor Major Infrastructure Planning Unit of the Planning Inspectorate.
- 17.4 After a long period of limited change at Sevenside sites are being brought to the market. The Council is concerned that the continuing development of individual land parcels ~~outside an overall agreed strategy or framework plan, without protection and mitigation of key interests, and without a degree of co-ordination,~~ could cumulatively impact on addressing the key constraints identified above and in particular:
- ~~it~~ would have a significant effect on the ecology and conservation assets of the Severn Estuary and cause significant and irreparable damage to estuarine and floodplain ecology;
  - reduce flooding capacity without improvement to flood defences and increase the risk of flooding to third parties;
  - damage the network of rhines which provide the local drainage network and which are of ecological interest;
  - worsen traffic congestion on the local road and motorway network; and,
  - result in the irretrievable loss of valuable archaeological assets.

It is therefore the Council's intention to work with the Local Enterprise Partnership, key landowners, statutory bodies and Bristol City Council to address these constraints.

- 17.5 Taking account of consultation responses and to address the problems above, *while recognising the extant planning permissions*, the following vision and policy has been drafted for the Severnside area. ~~*It provides a basis for collaborative working between public and private sectors for mitigation works within neighbouring land within the Severn Levels and the coastal zone.*~~

#### Vision

**Severnside will remain a strategically important location for employment uses. Employers, landowners and developers will work with the Council, other agencies and Bristol City Council to unlock its economic potential and improve local transport infrastructure. The Severn Estuary and adjoining floodplain is internationally important for a wide range of ecology and these ecological interests will be protected and a network of new nature reserves implemented, safeguarded and maintained. ~~Its~~ The archaeological heritage and interest of the Severn Levels will also be protected and conserved and a network of new nature reserves will be implemented. A longer term durable and robust strategy for addressing flood risk due to climate change will be adopted. The area's potential for power generation will be managed.**

- 17.6 The following policy will deliver this vision through managing development and where appropriate, partnership working.

#### POLICY CS35 – SEVERNSIDE

Land at Severnside will be safeguarded and developed for distribution and other extensive employment uses, including energy generation, broadly in line with the extant planning permissions dating from 1957 and 1958.

Notwithstanding the differing planning status of individual land parcels, the Council will ~~*invite individual landowners to commit to working co-operatively through a planning performance or co-operation agreement. This should set out both a strategic framework plan for the area which takes into account the most recent government guidance and a mechanism to deliver, reconcile and mitigate development with the*~~ continue to work with landowners, Bristol City Council, the Local Enterprise Partnership and statutory agencies to provide a strategic development approach which will help to deliver development while mitigating site constraints, including flood risk, coastal protection, biodiversity, archaeology and transportation.

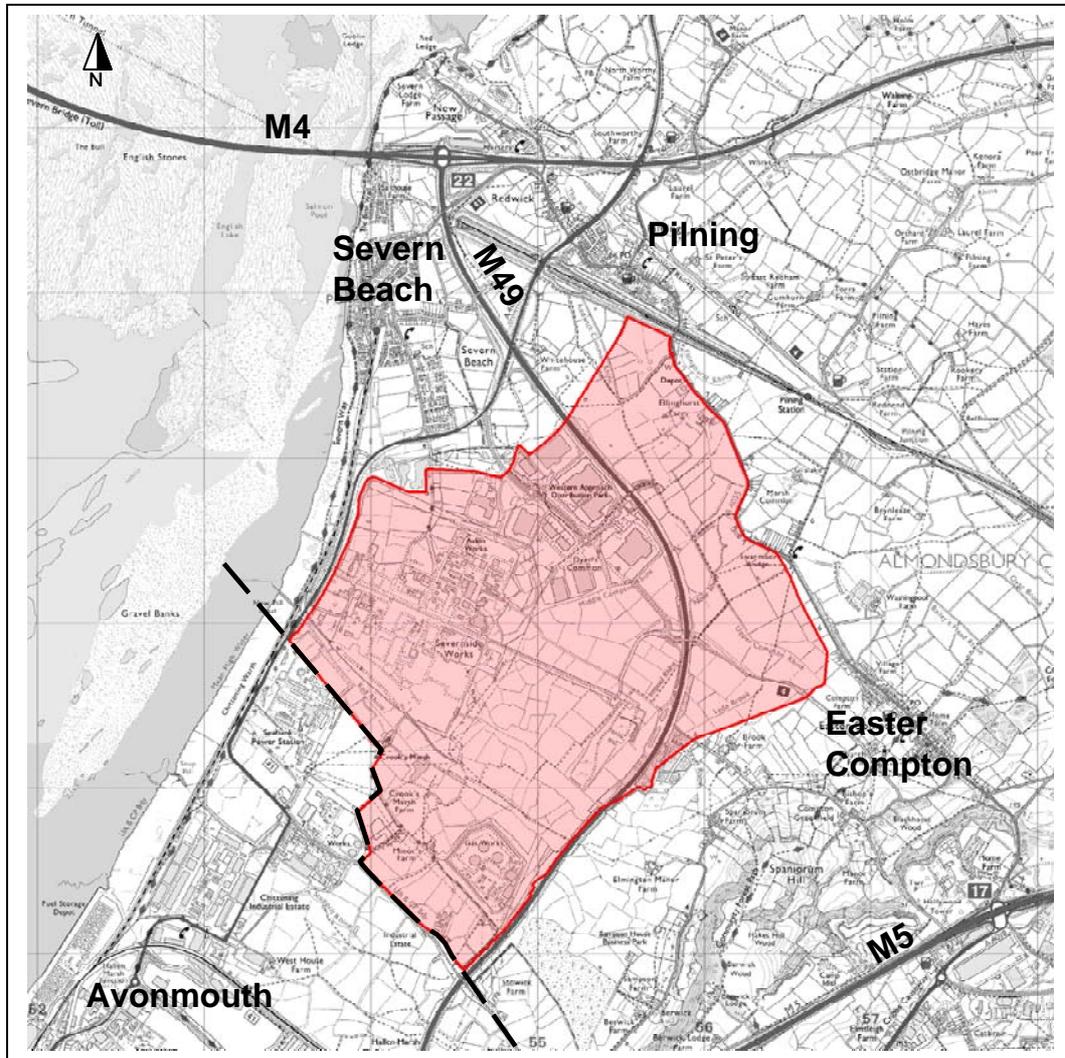
~~*Once an overall strategic framework is agreed the Council will expect to see Concept Statements prepared for individual sites. These should be prepared in line with the Council's Statement of Community Involvement and should as a minimum address site constraints, access, layout, landscape, design and service issues, and should take into account the most recent government guidance.*~~

~~*In the interim the Council will continue to work with Bristol City Council and statutory agencies to inform and develop mitigation strategies.*~~

~~*The Council's strong preference is to work with landowners and statutory agencies to secure a co-ordinated approach which addresses, resolves, and where necessary, mitigates site constraints.*~~

**Where agreement and co-operation is not achieved, the Council will be unlikely to support further large scale development and will regard it as unwelcome and potentially unsuitable. Opportunities to enhance the sustainability of the area through, for example development of an energy grid, will also be explored and delivered where feasible.**

Figure 13A Severnside



17.7 Although land at Severnside, as shown in Figure 13A, benefits from extant planning permissions, the situation is not uniform across this area, as some parts are previously developed and others have been the subject of more recent permissions. The position is therefore complex and the South Gloucestershire Local Plan sought to restrict further development until an overall strategy was in place to address the constraints referred to above and the potential cumulative effects of development. This has proved impracticable as some landowners have brought their sites forward for development under the extant planning permissions.

*The existing Policy E2 in the South Gloucestershire Local Plan places a restriction on significant further development at Severnside until such time as a masterplan has been prepared. However, in practice the existing permissions can be implemented without the need for further planning control and, therefore, without the need to meet*

~~the terms of Policy E2. As a consequence, development proposals that comes forward are not addressing the full extent of constraints referred to above nor the potential cumulative effects of development.~~

- 17.8 The Council, jointly with Bristol City Council and other bodies, has commissioned several studies to understand the development constraints affecting the Avonmouth-Severnside area and to understand how the economic potential of the area could be unlocked to realise the ambition for substantial economic development over the next 30-40 years. In mid 2011 the West of England LEP acknowledged the economic development opportunity offered by the area by identifying it as an Enterprise Area. The Councils have produced their vision for the area to 2050, together with an emerging strategy that identifies the key infrastructure and other supporting interventions that are needed to realise this vision.

~~As continued development under the extant permissions can still proceed, the use of a Local Development Document (e.g. Area Action Plan or Supplementary Planning Document) to guide future development is not considered appropriate. Instead, the intention is to seek co-operation from all landowners and public stakeholders/agencies (including the LEP) through a strategic framework plan for the whole area that has been agreed with the Council, together with a planning performance or co-operation to help fund infrastructure investment and mitigate risks associated with incremental development. This plan will then be amplified in more detailed, site specific, Concept Statements. Joint cross-boundary working between South Gloucestershire Council and Bristol City Council will be required to address many issues and constraints and to ensure that local residents are not negatively impacted upon by any continued development.~~

- 17.8a ~~Jointly with other partners, Bristol City and South Gloucestershire Councils have developed an initial Accelerated Development Zone (ADZ) bid to help fund infrastructure investment at Avonmouth/Severnside to mitigate the risks associated with incremental development. Advice from government on this bid and other potential sources of funding, such as Regional Growth Funding, is currently awaited. A project management approach is now being taken by the Council and Bristol City Council, in conjunction with the LEP, to develop the strategy and secure funding for the necessary infrastructure improvements. The following paragraphs provide more details on the development constraints.~~

## **Ecology**

- 17.8b In recognition of its nationally and internationally important wildlife, the Severn Estuary is subject to a series of nature conservation designations. It is a Site of Special Scientific Interest (SSSI), a Special Protection Area (SPA), and a Ramsar site (named after the Ramsar Convention on the Conservation of Wetlands of Importance). It is also a Special Area of Conservation (SAC) under the European Directive on the Conservation of Natural Habitats and Wild Fauna and Flora ('the Habitats Directive 1992'), implemented in Britain by the Conservation of Habitats and Species Regulations 2010 (Habitats Regulations). The protection afforded to the estuary also extends to any land used by European waterfowl. This presents a challenge in reconciling development at Severnside with continued use of the coastal floodplain by the species and assemblages of the Severn Estuary in such a way that it satisfies the ~~Conservation of Habitats and Species Regulations~~ and meets the conservation objectives of the site.
- 17.9 Under Regulation 63 of the Conservation of Habitats and Species Regulations 2010 the Council has a duty to review all unimplemented or partially implemented planning permissions likely to have a significant effect on the international nature conservation

designations covering the Severn Estuary. This review of consent (Habitats Regulations Assessment) ~~commenced in January 2010~~ has been carried out as part of a wider coastal floodplain wetland habitat project (including land gifted under the scheme) in partnership with Bristol City Council and Natural England. This review predicts that the impacts of future development-related habitat losses and associated disturbance events at Severnside could give rise to potentially significant effects upon the integrity of the SPA and Ramsar site.

- 17.9a In order to address these potentially significant effects, the review includes a mitigation strategy which has been developed to identify land for habitat creation/enhancement. A number of sites have been identified within Severnside and Avonmouth, and in the general vicinity, for future wetland habitat creation to off-set the habitat losses that have been predicted.

## **Flooding**

- 17.10 Severnside is at high risk of flooding. This will be exacerbated by higher tidal levels and more intense rainfall as a result of climate change. Flood capacity within the area will also decrease with further development, exacerbating future flooding impacts. A Strategic Flood Risk Assessment has been completed and it is recognised that a ~~A~~ strategic approach to managing flood risk at Severnside is required, which includes securing the necessary and piecemeal development should be avoided until required strategic flooding infrastructure is secured. The strategy and funding for this infrastructure is being taken forward by the Councils and the LEP ~~Therefore~~ Until this infrastructure is in place, the Council would strongly encourage the following:

- ~~The implications of the~~ In principle, a Strategic Flood Risk Assessment should be understood concluded before any further development takes place.
- Site specific Flood Risk Assessments should be prepared and should take into account the likely cumulative impacts of further development in the area and the effect on third parties.
- Any development proposals should demonstrate active engagement with the Lower Severn Internal Drainage Board, Marine Management Organisation and the Environment Agency.

- ~~17.13 The scope for improved strategic flood defences within the Severnside area and the opportunities for funding to be phased with any further development or redevelopment should be set out in the agreed strategy and cooperation agreement with individual landowners.~~

## **Archaeology**

- 17.14 The Severn Levels is an area of high archaeological potential because of the exceptional level of preservation of archaeological and palaeo-environmental remains surviving within the waterlogged silt deposits and peat layers. In addition the waterlogged conditions have resulted in the exceptional survival of earthwork remains of medieval and post medieval field and drainage systems. Development within this area can result not only in destruction of remains within the immediate development area, but also indirectly can increase water levels on adjacent land affecting the survival of waterlogged deposits.
- 17.15 Where development is proposed within the Levels, geotechnical surveys including borehole and geophysical surveys can provide valuable insight into the archaeological potential of the site without significant extra expense, provided

discussion with archaeologists takes place when the specifications for the surveys are being agreed. The Council would strongly encourage programmes of archaeological mitigation to be agreed and implemented prior to development taking place, in order to ensure that archaeological works do not delay development. These should include surveys of surviving earthworks, where these cannot be preserved *in situ*, as well as excavation and recording of surviving archaeological remains.

## Transport

- 17.16 The Highways Agency Avonmouth/Sevenside traffic model predicts the traffic impact for development scenarios without a new M49 junction in place. This clearly demonstrates that the limited capacity of the existing local road network will be overwhelmed by traffic demand arising from new development and there will be traffic congestion both within the Avonmouth/Sevenside area and on the road links leading up to it. This congestion will deter new businesses from setting up in the area, unless capacity is increased and access to major routes improved. There will also be adverse environmental impacts arising from the increase in traffic loadings.
- 17.17 *It is recognised that the construction of a new M49 junction is essential to realising the economic potential of the Sevenside area, and it has been identified as a priority improvement to the Strategic Road Network by the LEP. Funding for this junction is being actively pursued. Notwithstanding recent ad hoc development under the extant permissions, it continues to be technically possible to construct the M49 junction. Given the potential impact of future traffic the Council would wish to see the construction of the M49 junction funded and delivered as part of the development, with associated agreements that would place an upper limit on development levels until the junction is delivered, to reflect the limiting capacity of the strategic and local transportation network.*
- 17.18 While the Council will seek to direct HGV movement to the main routes to and through the area, employee related trips are more likely to use the local road network. The use of the motorway network for short commuter trips is also likely to increase. Use of the M5 junctions 17 and 16 and the adjoining minor road network by Sevenside development traffic would be of particular concern to the Council. A green travel approach will be encouraged for employee related trips to minimise car based travel.
- 17.19 ~~Therefore the preferred approach of the Council is to continue with the South Gloucestershire Local Plan approach which indicates that an acceptable and In summary, comprehensive development at Sevenside/Avonmouth will require the following three major road schemes, together with local road improvements:~~

- **The M49 Junction**

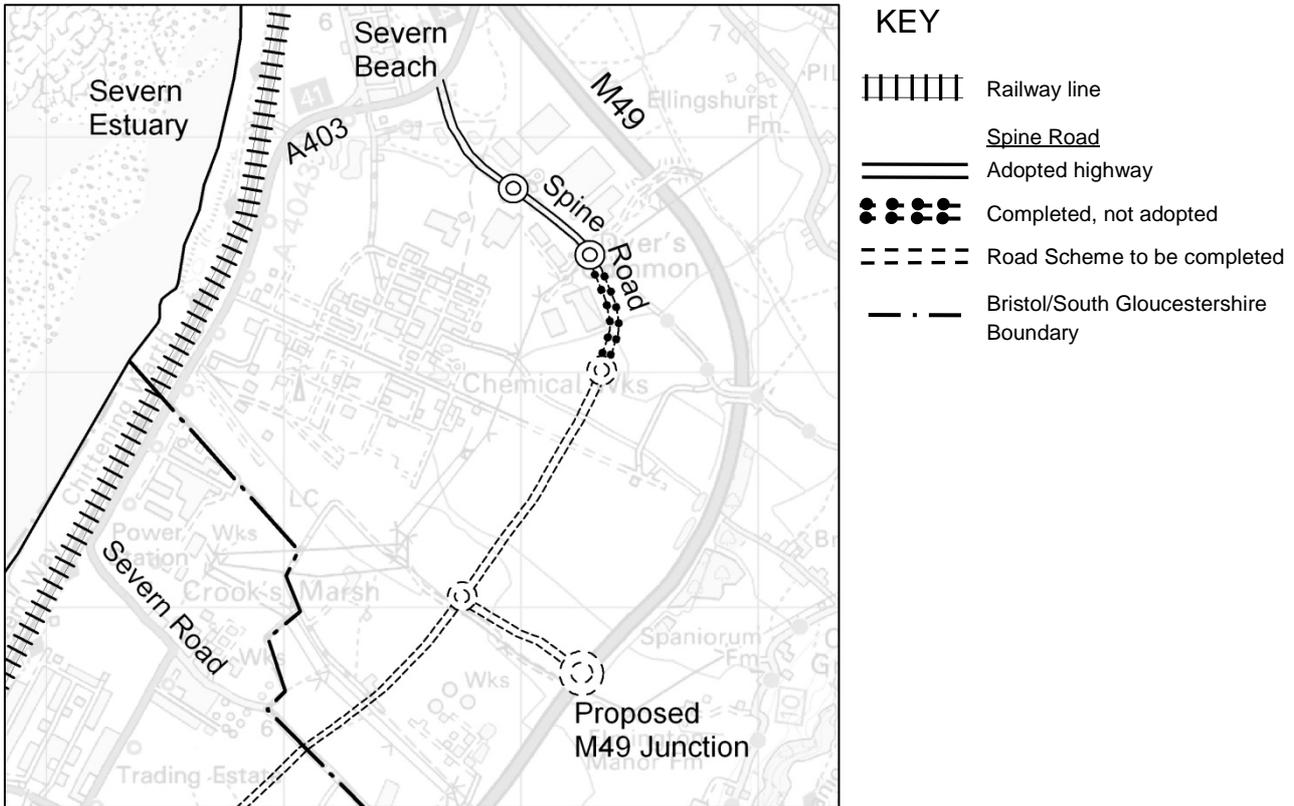
The principle of a junction on the M49, serving the large scale employment development at Sevenside and Avonmouth (in the Bristol administrative area).

- **The Spine Road**

It is anticipated that the spine road will become the realigned A403. A large section of the spine road has already been constructed, however, the precise alignment of the final sections to the south is not yet known. Cross-boundary working with Bristol City Council will need to ensure a suitable and sustainable linkage with the existing road network is provided.

- **Link Road to the M49 Junction**

The alignment of the link road from the M49 junction to the spine road serving the Severnside area cannot be defined precisely until the location of the junction and the spine road alignment have been finally determined. Figure 14 - Diagrammatic Plan of the location of the M49 Junction and alignments of the Spine Road and Link Road



**Figure 14 – Diagrammatic Plan of the location of the M49 Junction and alignments of the Spine Road and Link Road**

17.20 If these major road improvements are not delivered in combination with significant public transport improvements, then it is highly likely that the local road network serving Severnside would be unable to hold the anticipated level of traffic associated with further development. Further development should therefore ~~only~~ come forward ~~in combination~~ with a comprehensive transport delivery strategy, which ~~would~~ includes significant improvements to bus and rail services between Severnside, Avonmouth and Bristol.

**Partnership Priorities**

17.21 The coastal floodplain of the Severn Estuary used by wildfowl and waders straddles the boundary between Severnside and Avonmouth in the administrative area of Bristol City Council. The Council will work with:

- Bristol City Council and Natural England to:

- carry out a Habitats Regulations Assessment on any new applications under Regulation 61 of the Conservation of Habitats and Species Regulations 2010
- ~~review the extant planning permissions at Severnside under Regulation 63 of the Conservation of Habitats and Species Regulations~~
- Bristol City Council, Bristol Port Company, RSPB, British Trust for Ornithology, Natural England and Avon Wildlife Trust regarding allocating land for Local Nature Reserves.
- Bristol City Council, the West of England Local Enterprise Partnership, Landowners, Natural England, Environment Agency, Marine Management Organisation and the Highways Agency to establish an agreement and overall Strategic Framework Plan for Severnside agree a strategy for development and secure funding for the strategic infrastructure.

### **Delivery**

- 17.22 The purpose of the policy is, in partnership with Bristol City Council and the West of England Local Enterprise Partnership, to reach an agreement between landowners over the development/redevelopment of the Severnside area and the funding routes for delivering the strategic infrastructure, through a Strategic Framework Plan and a formal Agreement. Concept Statements will be expected for individual sites and will be required to demonstrate compliance with the Framework Plan. The delivery of brownfield land redevelopment will in addition be subject to the development management process.
- 17.23 Grants and other funding, including S106, other contributions, and grant regimes will be sought ~~to fund~~ for infrastructure improvements and the establishing and managing of ~~any~~ wetland habitats and Local Nature Reserves.