

Matter: 9

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Representation No: 60 / 61

Respondent: Jon Bray of Scott Brownrigg on
behalf of Goodman

South Gloucestershire LDF Core Strategy DPD Examination

Matter 9 - Filton Airfield

Statement on behalf of Goodman



24th May 2012

Examination Statement

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South Gloucestershire Core Strategy Examination

Matter 9 – Filton Airfield

Statement by Scott Brownrigg on behalf of Goodman

Introduction

1. Goodman have instructed Scott Brownrigg to act on their behalf and represent the views of the company at the upcoming Core Strategy Examination.
2. This Statement comprises the response of Goodman to the questions raised by the Inspector in relation to Matter 9 – Filton Airfield.
3. Goodman owns, develops and manages high quality commercial, industrial and logistics property with a global portfolio of 386 commercial properties and offices located worldwide.
4. Part of the Goodman portfolio includes 14ha of employment land within the Charlton Hayes mixed-use development area, approved under outline permission PT03/3143/O), which physically adjoins (and was formerly part of) the northern boundary of Filton Airfield. See Proposals Map PM3.
5. Charlton Hayes, along with the Airfield is located within the 'North Fringe of Bristol Urban Area' earmarked in the Core Strategy as a major strategic development location.
6. Whilst Goodman raise no 'in principle' objection to the overall strategy of bringing forward development to the area North of Bristol, they do have a number of concerns regarding the soundness of some of the detail. Those concerns are outlined in the following sections.
7. This Statement should also therefore be considered alongside other statements produced in relation to Matters 10, 14 and 22.

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8. Goodman are generally supportive of the need to plan properly for the future in light of the fact that the Airfield is going to close. Goodman are keen to be involved and to have full engagement with the Council on the development of the masterplan and to work together to realise the anticipated growth, jobs and change envisaged for the area. This was the basis of representations made in the earlier stages of the CS consultation process.
9. In relation to the Inspector's Question 1 - Goodman has no material comment to make in relation to whether an operational airfield at Filton should be retained and no objection is raised therefore in relation to the principle of redeveloping the Airfield.
10. However, Goodman are currently concerned that elements of the Core Strategy as drafted in the Dec 2011 submission version are likely to result in detriment to the local community, local businesses and Goodman's own land interests at Charlton Hayes.
11. Specifically, we consider that the Core Strategy will be ineffective and therefore unsound on a number of issues and that it should be revised to,
 - quantify the amount of floorspace provision at the Airfield and justify its need over the plan period and that it can be delivered without prejudicing existing local plan employment commitments that are located adjacent to the site;
 - make adequate provision for necessary supporting infrastructure, including local and strategic transport infrastructure;
 - include an explicit assurance that potential for prejudice through lack of even handedness in the application of policies and standards between new and existing/committed employment sites in the local area (thereby harming delivery of those existing sites) will not occur;
 - provide for greater flexibility in the drafting of 'safeguarded employment' policies (CS12) to encourage delivery and growth on committed sites and include site 5 'Employment Land at Filton Northfield' within CS 12 Table 2 to allow flexibility of uses to be considered on adjacent sites as part of the masterplanning of Filton Airfield.
 - provide for greater flexibility in the drafting of policies that deal with the way in which the North of Bristol Fringe developments come forward and are integrated alongside existing committed developments and neighbourhoods (CS25/26);
 - include (CS12) Site 5 'Employment Land at Filton Northfield' within the Cribbs/Patchway New Neighbourhood Framework Diagram and masterplan area (CS Fig 5 & 6);

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12. These matters are reflected upon in the following sections and outline our combined response to matters raised by the Inspector's Questions 2 - 5.

Transport and Infrastructure

13. The area North of Bristol has seen significant growth over recent decades.
14. This growth has not been matched by essential physical and social infrastructure, and as a consequence, there are significant in-commuting, traffic congestion and air quality problems.
15. This congestion also affects the frequency and reliability of public transport. The pace of growth which has taken place in the North Fringe has also 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. In many ways, the closure of the airfield represents a significant opportunity.
16. Whilst it is noted that the existing Airfield comprises circa 146ha of safeguarded employment land, it currently employs around 90 staff. In reality, there is no prospect of the full extent of employment land at the Airfield (including the runway) being redeveloped in its entirety for employment purposes.
17. So 50ha of what is effectively, new employment development land is a significant allocation in an area where there is already an imbalance between employment and non-employment uses. The Council themselves highlight that there are around twice as many jobs in the North Fringe as there are resident workers and that this has significant consequences.
18. In terms of whether this level of employment floorspace is needed, it is interesting to note that the Airfield is included within Table 2 of Policy CS16 as an Interim Safeguarded Employment Site. Paragraph 9.13 of the Policy suggests that such sites may be more suitable for alternative uses such as residential or mixed-use in the long term and that they will be subject to review.
19. Nevertheless, Goodman are concerned that an allocation of such a large area for employment development (as opposed to 'floorspace-neutral' airfield land) may exacerbate problems in terms of traffic and further in-commuting and will also harm the delivery of already committed employment floorspace in the local area (see below).
20. Notwithstanding the major increase in trips arising from the housing and retail elements of the New Neighbourhood, we have been unable to source a figure for the anticipated level of employment floorspace likely to arise from development of the Airfield. It will be substantial.

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21. It is considered that significantly more work is required on the road network effects to be able to conclude that the network would continue to function without negative effect arising from this major development.
22. The North Fringe Transport Review accepts that the road network will carry an increase of about 10% traffic even when the transport packages have been delivered.
23. As far as we are able to determine, the quantum of employment floorspace proposed for Filton Airfield and associated distribution of uses across the site has not been outlined. We would question the findings of the Transport Review without this information being made available.
24. As the road transport network is already stressed, **further transport mitigation works are required to nullify the increases in traffic on the network.**
25. For example, the report assumes that large publicly funded public transport initiatives commence, such as the extension to the BRT and Greater Bristol Metro etc. It would be good to understand what further measures would be planned, in the event these projects and others are delayed or cancelled.
26. The Transport Report places significant emphasis upon a future change in modal split to justify delivery of the new neighbourhoods and employment. Yet, we feel that more could be done to encourage trips (particularly commuter trips) by public transport.
27. Goodman urge the Council and highway authority to review potential routing and timing of public transport routes as the masterplan for the area progresses, in Transport Plans and SPD to secure a greater proportion of commuter journeys to and from committed and proposed employment sites in the area by non-car modes. It is noted that the proximity of the new high frequency routes are unlikely to make it attractive for future employees to leave their cars at home. Bus routes need to be within an acceptable walking distance of commercial premises to be effective in changing travel patterns
28. In terms of access solutions put forward in Figures 5 and 6 of the CS (as supported by the RD32 North Fringe Transport Review) we have the following comments to make.
29. The route of any proposed access to the airfield should be carefully considered and should take into account existing designations and permissions, such as those at Charlton Hayes.

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30. The CS Framework plan (Fig 6) and Transport Review assume exits from the north of the airfield site at each of the existing 3 roundabouts on the new carriageway across Charlton Hayes. One of these exits crosses Goodman land and we do not believe that it is likely to be deliverable.
 31. Goodman would resist a route through Site 1 (Eastern Employment Land) at Charlton Hayes as it would sever and significantly impact upon the deliverability of this plot, reducing our ability to market it effectively.
 32. The proposed access through Goodman Site 1 was designed as a 20mph road and is unlikely to be able to carry the volume of traffic required to serve the airfield.
 33. There is scant information provided on the planned southerly exit through BAES existing Airbus development but it would seem unlikely that this route through a business park would be able to carry the volume of traffic required. More accesses to the south are likely to be required than currently planned.
 34. The A38/NF8 junction on the new carriageway will carry all of the planned traffic exiting the north of the site that doesn't use the Cribbs Causeway exit. Even with the proposed improvements to this junction, it is anticipated that delays at this point will result.

Prejudicing Delivery of Committed Employment Sites

35. Goodman have been actively marketing 14ha of employment (B1a/B2/B8) land at Charlton Hayes for 4 years. However, in a depressed market, securing tenants and associated delivery of employment floorspace and jobs on the site has proved to be difficult.
36. Goodman are keen to ensure that the Core Strategy does not make the delivery of their committed sites any more difficult.
37. We are currently unclear as to the anticipated quantum of employment floorspace proposed at the airfield, nor the likely split between, B1, B2, B8 & A uses. The Council needs to identify the forecasted number of jobs that will be created at Filton Airfield and ensure it is properly justified and the allocation deemed sound.
38. Whilst not a detailed matter to be considered at the CS stage, Goodman would like to see reference made within the CS (e.g. in supporting text) that potential for prejudice through lack of even handedness in the application of policies and standards (e.g. design / parking standards) between new and existing/committed employment sites in the local area will not occur as sites are delivered.

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39. Goodman have an outline planning permission that is very prescriptive in terms of design parameters (secured by a very detailed Site Wide Design and Access Statement and approval process that requires Masterplans and Design Codes to be approved prior to submission of Reserved Matters) and restrictive parking standards (at a ratio of 1:40 sqm).
40. A recent example of where uneven handed standards have been applied is at Rolls Royce in Filton on their site to the west of the A38 on which they secured approval for parking at a more relaxed ratio of 1:35 sqm.
41. The Council must guarantee that there will be consistency in the application of such standards and processes across the North Fringe area. This would be achieved either through applying 'Goodman restrictions' consistently across new developments also, or by relaxing 'Goodman restrictions' at Charlton Hayes accordingly to provide consistency. This would prevent the new developments attracting beneficial advantage and harming delivery potential of existing committed sites at Charlton Hayes.
42. Should any future Enterprise Area / Enterprise Zone at the Airfield be established and seek to streamline planning procedures, it should be guaranteed that employment sites outside of the designated zone should not be prejudiced (or should be included within such a Zone and benefit from the same provisions).

Flexibility

43. Linked to the issue of potential prejudice and consistency, but also an issue in its own right is that of ensuring that the Core Strategy is flexible and can facilitate delivery of growth across the plan period.
44. The Airfield masterplan will need to fully integrate with existing and committed development in the surrounding area. With specific regard to the Goodman employment land at Charlton Hayes (CS12 Site 5), it would make sense to view sites that have yet to be delivered as integral, alongside new development proposed at Cribbs/Parkway and the Airfield.
45. Although the Goodman land is, under Policy CS12, Safeguarded Employment Land, there should be an element of flexibility provided within the Core Strategy (either by way of CF12 or CF25/26 or both) to facilitate alternative uses on these sites, should it emerge that they would be better integrated into the wider development under alternative uses.
46. CS12 could also facilitate the potential to secure alternative uses on safeguarded employment sites where alternative uses can be shown to deliver growth and jobs - for example where retail, leisure, mixed-use schemes can deliver growth where Class B uses cannot.

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47. Policy CS12 should make reference to the fact that some non-B Class uses can also provide substantial economic benefits. National policy emphasises that policy should be flexible enough to accommodate growing sectors and users not anticipated in the plan and allow for quick responses to changes in economic circumstances.
48. We support that the core definition of economic development includes a wider range of employment generating uses in addition to B Class uses, but this is not fully carried through into Policy CS12.
49. The criteria proposal for assessment of “non B Class” uses in the Core Strategy are too restrictive. In particular, it is believed criteria should also recognise the need to help secure and support existing businesses in the area ensuring their business can be expanded, or indeed, relocated if necessary to meet growing operational needs.
50. It is proposed that Criteria 3 should be amended to read:
- “3. The proposal would help secure (support) existing businesses or improve the number or range of jobs available in the local area”
51. Criteria 4 of Policy CS12 is unnecessary and overly restrictive.
52. The authority is unable to determine individual operator requirements and should not be able to specifically direct development to an alternative site which is potentially unable to meet operational needs and may not be preferable in terms of planning policy aspirations. Instead the development plan should enable individual proposals to be considered on their merits, having regard to the correct planning policy framework and in particular relevant policies within the development plan.
53. A further concern that we have with the Core Strategy as currently drafted is the status afforded to a number of employment locations around the North Fringe as ‘Interim Safeguarded Employment Sites’ under Policy CS12 Table 2.
54. Policy CS12 outlines that employment sites in these locations will be safeguarded until their future use is resolved through endorsed Concept Statements, Masterplan and Detailed SPD or the Policies, Sites and Places DPD.
55. Further, paragraph 9.13 identifies that these employment areas will be ‘*subject to review*’, and that, ‘*in the long term, alternative uses on these areas may be more appropriate, such as residential or mixed-use*’.

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56. Whilst this provision offers Interim sites flexibility, no such flexibility is afforded to Table 1 safeguarded sites.
57. An example is the relationship between CS12 Site 5 (Goodman land at Northfield) and the adjoining Filton Airfield, CS12 Site 52. Goodman have had difficulty in securing delivery of their land for employment since it was marketed in 2008. This suggests that there may be an issue with the amount and location of employment land in the area.
58. The current outline planning permission for Charlton Hayes places restrictions upon the way in which development will come forward in relation to design and layout (e.g. through use of 'perimeter block' layouts and form and building height restrictions) as well as use.
59. In light of the Airfield proposals, these requirements appear outdated and we would like to see flexibility applied to ensure that any development which does come forward on Goodman land can address the relationship to the Airfield more appropriately than currently provided for in the permission. This applies to use, but also to design – e.g. a 360 degree 'campus' style layout would better integrate with future development envisaged to the south.
60. We are currently unclear as to the anticipated quantum of employment floorspace proposed at the airfield, nor the likely split between, B1, B2, B8 & A uses. No detail has been offered in relation to where in the western proportion of the airfield site each of these B or A etc uses will be located and given the proximity of our sites to the airfield site, where each cluster of uses is to be located, will have a considerable effect upon the most suitable uses for our sites. We must have flexibility to change uses, once we have been informed of the size and location of each employment type of use.
61. Whilst we accept that any short-term proposals affecting design could be dealt with by way of a planning application, the policies as currently drafted in the Core Strategy do not provide for flexibility in terms of allowing for a range of uses.
62. Goodman contend that if land at the Airfield is potentially capable of being brought forward for residential or mixed-use, then equal status should be afforded to committed sites on adjacent land at Charlton Hayes. Particularly as that land has been actively marketed for a number of years already.
63. This could be secured by placing Site 5 'Employment Land at Filton Northfield' within CS12 Table 2 or applying a similar caveat afforded to Table 2 sites to all Table 1 safeguarded locations.
64. Additionally, the final line in paragraph 9.10 stating, '*Residential use will not be acceptable as provision has been made elsewhere in the Core Strategy*' should be deleted. This restricts flexibility not just in the North Fringe, but

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across the whole district and is particularly important as the Airfield site brings significant opportunity to consider the masterplanning of the whole North Fringe area, including distribution of uses.

65. Alternatively, greater flexibility could be provided for in the drafting of policies that deal with the way in which the North of Bristol Fringe developments come forward and how development is integrated alongside existing committed developments and neighbourhoods (Policies CS25/26);
66. If Goodman land at Northfield/Charlton Hayes (Proposals Map PM3) were included within the Cribbs/Patchway New Neighbourhood Framework Diagram and masterplan area (CS Fig 5 & 6), this would facilitate a holistic, flexible approach to the masterplanning of the area.

Conclusion

67. Goodman consider that the Core Strategy will be ineffective and therefore unsound on a number of issues and that it should be revised to,
- quantify the amount of floorspace provision at the Airfield and justify its need over the plan period and that it can be delivered without prejudicing existing local plan employment commitments that are located adjacent to the site;
 - make adequate provision for necessary supporting infrastructure, including local and strategic transport infrastructure;
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 - provide for greater flexibility in the drafting of policies that deal with the way in which the North of Bristol Fringe developments come forward and are integrated alongside existing committed developments and neighbourhoods (CS25/26);
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6	/	CSE – Matter 9	22/5/12	JB	JB
7	A	CSE – Matter 9	23/5/12	JB	JB
8	B	CSE – Matter 9	24/5/12	JB	JB