

Bristol City Council

Further Representation to the South Gloucestershire Core Strategy

Matter 9: Filton Airfield

The following statement should be read in conjunction with Bristol City Council's (BCC's) representations to the December 2011 South Gloucestershire Post Submission Changes. These highlighted the following:

- I. A key priority must be to maximise opportunities for the consolidation and growth of the aerospace/advanced engineering cluster and associated industries
- II. Employment growth must be at the heart of the objectives which drive development at the Airfield and within the wider Cribbs/Patchway area
- III. The change of status of "Land West of the A38 (inc. the runway and Royal Mail Depot)", as proposed in the Post Submission changes, no longer provides any certainty that it will be allocated for employment uses. It should be given full protection, with around 70 Ha safeguarded for employment development.
- IV. The unique opportunity to attract specialist industries to the Airfield site should take precedence over other considerations.

Q.1 Is there any evidence to show a case can be made for retaining an operational airfield at Filton?

- 1.1 BCC does not wish to make any further comments on this matter (see earlier representations to the Core Strategy Post Submission Changes).

Q.2 Is the balance of uses proposed for this area appropriate to the needs of the North Fringe and Bristol Area?

- 2.1 Proposed land uses for the wider area focused on the Airfield are specified in various parts of the Post Submission Changes, but principally in revised policy CS26. Within the wider Cribbs/ Patchway New Neighbourhood area there are proposals for housing (5,700 dwellings) and retail (35,000 sq.m) at The Mall. About 50 Hectares of employment are proposed for the eastern part of the Airfield, associated with the Aerospace Cluster. There are other references to mixed uses, including unspecified quantities of leisure and green infrastructure. Chapter 12, Figure 6, shows indicative locations for housing at Haw Wood (85 Ha), and mixed uses at New Charlton and Cribbs Causeway/The Mall.
- 2.2 BCC's concerns regarding major retail growth at Cribbs Causeway are set out in a separate statement relating to Matter 13.

- 2.3 BCC is also concerned about the potential impact of the large scale development within the Cribbs/Patchway area in respect of traffic and parking. This could adversely affect adjoining communities in Bristol, as well as adding to existing congestion on routes in this part of the North Fringe.
- 2.4 It is noted that the representations made by The Highways Agency to consultation on the Post Submission Changes record that they have been unable to complete the necessary transport modelling for the area around the “motorway box”. If available, this could have contributed to a better understanding of the impacts of additional traffic generated by new development in and around Filton. At present, there is considerable uncertainty about the ability of new/improved transport infrastructure to adequately address the additional stresses on the transport network in the area.
- 2.5 The Highways Agency, in its response to the Post-Submission Changes, states that: *“The Core Strategy is expected to have an impact on the M4, M5 and M32 around Bristol. To this end, I have been working closely with South Gloucestershire Council to better understand the impact that the emerging Core Strategy, incorporating post submission changes, will have on our network. The Agency goes on to comment on progress: “Hence at this time, I am unable to comment on the impact of the proposals contained within the emerging Core Strategy, incorporating post-submission changes, on the SRN (Strategic Road Network) until the modelling evidence has been provided. At the time of the PHM it was understood that the requisite modelling was still not available. This uncertainty is coupled with further doubts regarding the deliverability of a full package of transport proposals, which will depend on the viability of developments and their capacity to contribute to essential infrastructure.*
- 2.6 It would be desirable to have modelled various land use and infrastructure options to establish which offered the best combination of viability and infrastructure delivery. BCC is not aware of any work of this nature having been undertaken and is concerned that the overall quantum of development for the Cribbs/Patchway area may be excessive. In the circumstances, it would be prudent to plan for a less intensive development requiring a more modest and realistic level of investment in transport infrastructure. BCC believes that amendments should be made to the Post Submission Changes to the Core Strategy to achieve this, by rebalancing the land use mix as follows:
- No significant growth in retail floorspace at The Mall
 - A reduction in residential growth, of the order of 1,600 dwellings, achieved by retaining the Haw Wood site within the Green Belt and by reducing the residential content of development at The Airfield.

- An increase in the scale of employment land at the Airfield from about 50 Ha. to 70 Ha. This would help address the employment needs of Bristol residents within the Northern Arc area of the City, where unemployment is a key issue. It would also capitalise on the unique opportunity to attract further investment in aerospace industries to a location which already has an outstanding heritage of aerospace engineering.

Q.3 *To what extent has the Council had regard to the impact of development at the Airfield on the surrounding communities including those in the City Council's area?*

3.1 With regard to the impacts of development, SGC has responded in part to BCC's concerns that the amount of employment land to be provided at The Airfield is insufficient. SGC now proposes to allocate 50 Ha. of land at the Airfield (compared with 70 Ha. sought by BCC). However, this is only proposed to be safeguarded in the short term. This creates uncertainty regarding the future of the site and is likely to limit the employment benefits to North Bristol communities. This issue is discussed further in the response to Question 5.

3.2 Other impacts are addressed in the response to Question 2 above, reflecting the close relationship between land use mix and impacts on surrounding communities.

Q.4 *Some businesses and organisations have concerns that development of the Airfield could undermine their existing operations. Are their fears valid?*

4.1 The City Council has no comments on this matter.

Q5. *Is the amount of land to be retained for employment purposes adequate?*

5.1 It is assumed that this question relates primarily to the area which comprises the existing operational runway, including the green area immediately surrounding it. This is consistent with Maps 1 and 2 as appended to the Filton Airfield Position Statement of June 2011. However, it is essential to consider the planning of this area in the context of adjacent development sites and communities and the wider development needs of the sub-region.

5.2 Policy CS12 of the Pre-Submission Publication designated the eastern end of the runway, described as "Land West of A38 (inc. runway & Royal Mail Depot)", as a Safeguarded Area for Economic Development. Essentially, the policy sought to retain the area for B Use Classes, subject to four listed exceptions. The land subject to the designation was defined in mapped form in the Changes to the Proposals Map dated December 2010 (page 19). Subsequently, the

Post Submissions Changes, which followed the proposals to close the Airfield, were published. These altered the designation for this area from “Safeguarded Area” to “Interim Safeguarded Area”.

- 5.3 The effect of this change was to reduce the protection afforded to the area, such that it would be safeguarded only until its future use was resolved through endorsed Concept Statements, a masterplan and detailed SPD, or the Policies, Sites and Places DPD. This would harm any prospects for its successful marketing for employment uses.
- 5.4 The City Council is concerned that the above change fails to define the future role of this area and opens up the possibility that this will be determined through the preparation of SPD. It is the City Council’s view that the Airfield site has a critical role in realising the economic potential of the sub-region and that this cannot be assured through the approach promoted in the Post-Submission Changes, because:
- The policy change does not identify the scale of land which is to be allocated for employment use in the future: indeed, it creates the possibility that none might be allocated.
 - The Core Strategy is the appropriate vehicle for making planning decisions involving key economic decisions, particularly where these will affect the wider sub-region.
 - It is wholly inappropriate to determine the future economic role of the Airfield through SPD, except within the framework of an adopted Core Strategy.
 - There is a particular imperative to ensure that proper consideration is given to realising the economic potential of the site in the light of NPPF policies which urge local planning authorities to:
“identify and plan for new or emerging sectors likely to locate in their area”; and
“plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries”
(NPPF Paragraph 21)
- 5.5 As outlined in its response to consultation on the Post Submission Changes document, the City Council believes that around 70 Ha. of land at the eastern end of the Airfield should be allocated for employment use. This would create a critical mass of development, located close to existing aerospace businesses and separate from housing and other sensitive receptors which could potentially be a constraint on industrial activity.

6. Concluding Comments

- 6.1 BCC acknowledges that the level of employment land proposed within South Gloucestershire as a whole is broadly adequate, but

believes that the eastern end of the Airfield is a special case, justifying a further allocation and a clear commitment to safeguarding.

- 6.2 There is a need to be ambitious for the sub-region's economic future and to plan positively for the Airfield site - already recognised as an Enterprise Area. There is an exceptional opportunity here to promote a major employment hub, with a national profile and a distinguished history. The uncertainty arising from a short term allocation for employment would actively discourage further investment by aerospace and related industries which could otherwise be attracted to consolidate on the eastern runway land.
- 6.3 The above approach is consistent with SGC's published Vision for Cribbs/Patchway which states:

“In 2026 the Cribbs/ Patchway area is home to the world leaders in advanced engineering and aerospace industries. As a whole this area accommodates the bulk of the workforce for local employment in north fringe, forging strong and lasting links with major employers whilst encouraging new and diverse local employment opportunities.”