

Matter: 10

Personal ID: 4003361

Representation No: 60 / 61

Respondent: Jon Bray of Scott Brownrigg on
behalf of Goodman

South Gloucestershire LDF Core Strategy DPD Examination

Matter 10 - Distribution of Economic Development Land, Safeguarded and Non-Safeguarded Employment Sites

Statement on behalf of Goodman



24th May 2012

Examination Statement

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24/05/2012

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South Gloucestershire Core Strategy Examination

Matter 10 – Distribution of Economic Development Land, Safeguarded and Non-Safeguarded Employment Sites

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 10.
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 9, 14 and 22.

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Inspector's Question 1 - Is the amount of employment land provision sufficient to support the economic growth of the sub-region over the plan period?

8. In relation to question 1, Goodman note the findings of the Employment Land Review and have no overall comment to make in relation to the quantum of employment land supply across the district.
9. However, we are currently unclear as to the anticipated quantum of employment floorspace proposed at Filton Airfield, nor the likely split between, B1, B2, B8 & A uses at that location. 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 accordingly.
10. Goodman are concerned that elements of the Core Strategy as drafted in the Dec 2011 submission version are likely to result in detriment to the community, local businesses and Goodman's own land interests at Charlton Hayes arising from policies CS12, CS25 and CS26 and employment allocations proposed in the North of Bristol Urban Fringe.
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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Inspector's Question 2 - Will the proposed distribution of employment land help to encourage more sustainable lifestyles?

12. A substantial proportion of the proposed employment in the borough is anticipated to be located within the area North of Bristol, which has seen significant growth over recent decades. In particular, 50ha of employment land is proposed for Filton Airfield.
13. Growth North of Bristol 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 in that area.
14. 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.
15. 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.
16. 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.
17. 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).
18. 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.
19. 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.

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20. 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.
 21. As the road transport network is already stressed, **further transport mitigation works are required to nullify the increases in traffic on the network.**
 22. 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.
 23. 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.
 24. 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. 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

Inspector's Question 3 - The distinction between safeguarded and non-safeguarded sites appears to reduce the flexibility within the CS to allow for changing circumstances. Is this distinction necessary or desirable?

25. Goodman consider the Core Strategy to be ineffective in this regard.
26. Planning policy needs to be able to react to changing market circumstances and enable proposals for unanticipated potential occupiers to be considered on an individual basis.
27. There should be greater flexibility afforded within the Core Strategy Policy CS12 to facilitate potential to secure alternative uses on safeguarded employment sites where alternative uses can be shown to deliver growth and jobs. There may be circumstances where retail, leisure, mixed-use schemes can deliver growth where Class B uses cannot.
28. Policy CS12 should make reference to the fact that some non-B Class uses can also provide substantial economic benefits. National policy emphasises

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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.

29. 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.
30. 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.
31. 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”
32. Criteria 4 of Policy CS12 is unnecessary and overly restrictive.
33. 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.
34. 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.
35. 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.
36. 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*’.
37. Whilst this provision offers Interim sites flexibility, no such flexibility is afforded to Table 1 safeguarded sites.

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38. 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.
39. The policies as currently drafted in the Core Strategy do not provide for flexibility in terms of allowing for a range of uses at CS12 Site 5.
40. 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.
41. 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.
42. 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 across the whole district and is particularly important at Charlton Hayes as the Airfield site brings significant opportunity to consider the masterplanning of the whole North Fringe area, including distribution of uses.

Conclusion

43. 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;
 - 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

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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);

Contents Amendment Record

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Signed	Checked
7	/	CSE – Matter 10	23/5/12	JB	JB
8	A	CSE – Matter 10	24/5/12	JB	JB