

Matter: 14

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 14 - Strategic Transport and Accessibility

**Statement on behalf of Goodman**



24th May 2012



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**Examination Statement**

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Goodman – Matter 14

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24/05/2012

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13881P-RT-002\_A

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**South Gloucestershire Core Strategy Examination**

**Matter 14 – Strategic Transport and Accessibility**

**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 14 – Strategic Transport and Accessibility.
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, 10 and 22.
8. 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.

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9. 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);
10. These matters are reflected upon in the following sections and outline our combined response to matters raised by the Inspector's Questions on this Matter.

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11. The area North of Bristol has seen significant growth over recent decades.
12. 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.
13. 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.
14. 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

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Airfield (including the runway) being redeveloped in its entirety for employment purposes.

15. 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.
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.
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 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.
22. As the road transport network is already stressed, **further transport mitigation works are required to nullify the increases in traffic on the network.**
23. For example, the report assumes that large publicly funded public transport initiatives commence, such as the extension to the BRT and Greater Bristol

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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.

24. 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.
25. 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
26. 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.
27. 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.
28. 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.
29. Goodman would resist a route through Site 1 (Eastern Employment Area) at Charlton Hayes as it would sever and significantly impact upon the deliverability of this plot, reducing our ability to market it effectively.
30. 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.
31. 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.

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32. The A38/NF8 junction on the new carriageway will carry all of the planned traffic exiting the north of the site. Even with the proposed improvements to this junction, it is anticipated that delays at this point will result.
33. Goodman are keen to ensure that the Core Strategy does not make the delivery of their committed sites any more difficult.
34. 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.
35. Whilst not a detailed matter to be considered at the CS stage, Goodman would also 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. parking standards) between new and existing/committed employment sites in the local area will not occur as sites are delivered.
36. Goodman have an outline planning permission that is very prescriptive in terms of parking standards (at a ratio of 1:40 sqm). 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).
37. 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.

**Conclusion**

38. 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

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- 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);

Contents Amendment Record

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Signed	Checked
7	/	CSE – Matter 14	23/5/12	JB	JB
8	A	CSE – Matter 14	24/5/12	JB	JB