

PSM23

**South Gloucestershire
Core Strategy
Examination**

**Position Statement
for
Matter 23: Severnside (CS36)**

June 2012

Matter 23 – Severnside (CS36)

Q1 Is the approach in policy CS35 consistent with government objectives in the Planning Framework and the Ministerial Statement on ‘Planning for Growth’ to encourage sustainable economic development?

Council response –Yes, subject to the suggested changes in Appendix A

1.1 The Severnside area has major environmental constraints but very limited planning controls given the extant planning permissions dating from 1957/58. Policy CS35 was drafted to reflect the strategic ambition (originally promoted in the South Gloucestershire Local Plan) to provide for co-ordinated development once major constraints had been investigated and addressed comprehensively. Since Policy CS35 was drafted circumstances have changed:

- Individual landowners have brought forward proposals, which have proved difficult to resist given the extant permissions, with landowners following masterplan principles for their individual holdings;
- The Council has worked with Bristol City Council to inform and consider a development strategy for the whole Avonmouth- Severnside area; and
- The NPPF has been published.

1.2 Policy CS35 was drafted within the context of the Council’s overall approach to employment land, which is set out in its response to Matter 10:

“A key role of the Core Strategy is to make provision for sufficient land, suitable for employment use, in the right locations, to meet the business development needs of the area. The Core Strategy approach is based on a clear understanding of business needs which have been established in the Employment Land Review (Examination Library EB23-EB25). This was prepared in the context of PPS4 but is also in conformity with paragraphs 160 and 161 of the NPPF. The approach is also in conformity with paragraphs 18 – 22 of the NPPF; as future opportunities for growth and redevelopment have been identified, a clear vision set and land allocations have been recently reviewed.”

1.3 The Government’s ‘Planning for Growth’ Statement of March 2011 is aimed at ensuring that the planning system does everything possible to support economic growth and sustainable development to help re-build Britain’s economy. These aims have subsequently been incorporated in the NPPF. Paragraph 7 of the NPPF recognises the need for planning to balance economic, social and environmental roles. The availability of extensive employment land at Severnside is potentially advantageous to the local and regional economy, but paragraph 7 makes clear the need is also to ensure that:

- i. Sufficient land of the right type is available in the right places and at the right time to support growth and innovation;
- ii. Development requirements, including the provision of infrastructure, are identified and co-coordinated;
- iii. The natural, built and historic environment is protected, biodiversity enhanced and resources used prudently; and

- iv. Development mitigates and adapts to climate change and assists the move to a low carbon economy.

1.4 In addition, and in respect of planning policies, paragraphs 21 of the NPPF states that:

“Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.”

- 1.5 The Council has little control over the supply of land in the Severnside area, but is keen to ensure that the business and employment opportunities which come forward are appropriate to the area. In being largely geared towards logistics the opportunities at Severnside, while perhaps not entirely sustainable in their own right, should help to release sites in and around the urban area to foster sustainable regeneration.
- 1.6 Since Policy CS35 was drafted, the context for Avonmouth/Severnside has moved on. The Council, jointly with Bristol City Council, has commissioned a study (Examination Library Ref: EB68) 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 and the provision of up to 20,000 jobs. In mid 2011 the West of England LEP acknowledged the economic development opportunity offered by the area, 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 the vision (Examination Reference EB68/1).
- 1.7 The studies for Avonmouth/ Severnside provide for a much better understanding of the nature of constraints and the costs of overcoming them than was the case when Policy CS35 was drafted. The emerging Strategy for Avonmouth/Severnside is not simply targeted at realising the employment potential of the area but provides for a comprehensive approach. The focus on managing and overcoming flood risk is a specific response to concerns over climate change. The strategy for logistics and sustainable power generation should help to develop the low carbon economy. The scope to also capitalise on waste heat, through heat networks, etc., is being actively investigated.
- 1.8 In conclusion, the Council’s approach to Severnside, as set out in Policy CS35, has been the subject of ongoing review as technical studies have been completed and national policy has changed. The Council considers that its approach, which is to facilitate employment development while seeking to mitigate environmental constraints, is consistent with the Government’s objectives in the ‘Planning for Growth’ Ministerial Statement and the NPPF. Suggested changes to Policy CS35 are, however, put forward to better align the policy with the NPPF (see Appendix A).

Q2 In view of the extant planning permissions affecting land at Severnside is the Council’s strategy for the area deliverable?

Council response – Yes, subject to the suggested changes in Appendix A

- 2.1 The approach of trying to ensure a comprehensive solution to environmental constraints and phasing to development at Severnside is still relevant if the full

potential of the area is to be realised without compromising environmental conditions. The aim of working with landowners, Bristol City council, statutory bodies, and now with the added support of the LEP, is still relevant and indicates a greater likelihood of a positive and co-ordinated outcome than appeared to be the case when the policy was first drafted. It is therefore no longer appropriate or practical to place an embargo on development in the Severnside area and the Council accepts that this reference should be deleted from Policy CS35. The Council also accepts that resolving/mitigating the major environmental constraints should not fall exclusively to landowners and developers. The Councils and the LEP are looking at ways to fund this and are hopeful that the necessary funding can be secured. Suggested changes to Policy CS35 are set out in Appendix A.

- 2.2 The supporting text in Chapter 17 requires updating to reflect the changing context and the changes to Policy CS35. Suggested changes will be prepared and submitted to the Inspector prior to the Hearing session.

Q3 Is there evidence to show the implementation of extant permissions would have adverse impacts on nature conservation or archaeological assets or be likely to increase flood risk?

Council response – Yes, but there are strategies to mitigate these impacts.

- 3.1 There is longstanding recognition that there significant constraints to development at Severnside, and within the adjoining area of Avonmouth in Bristol City. Given this situation, both South Gloucestershire and Bristol City Councils have commissioned a number of studies to better understand these constraints and to help inform decisions about the development of land and the future development potential of the area. These studies are:

- SFRA Level 2 Avonmouth-Severnside (Examination Library Ref: EB31)
- Severnside & Avonmouth Wetland Habitat Project (“Cresswell Report”) (Examination Library Ref: EB67)
- Avonmouth and Severnside Integrated Development, Infrastructure and Flood Risk Management Study (Examination Library Ref: EB68)
- Avonmouth Severnside Development Strategy Report (Examination Library Ref: EB68/1)

- 3.2 In considering the most effective way to mitigate the likely adverse impacts or implications, the following paragraphs:

- i. identify the likely impacts on nature conservation interests and archaeological assets with further implementation of the 1957/58 extant permissions at Severnside (as modified by the WAP S106 agreement) and the implications for flood risk;
- ii. demonstrate how these impacts can be reduced through mitigation.

Nature Conservation

3.3 The Severn Estuary is designated as a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, since it supports a range of habitats and species of national and international nature conservation importance. The SPA and Ramsar site designations are based upon the presence of species and populations of overwintering and migratory water birds of international and national nature conservation importance. While these bird communities are primarily associated with saltmarsh and intertidal areas, a number of other habitats outside of the designations are also used as roosting and/or feeding sites for wildfowl and waders. These sites include parts of the coastal floodplain, including land within the area of the 1957/58 permissions at Severnside. As the further implementation of these permissions is likely to have a significant effect on the SPA and Ramsar site designations, a review of these permissions is required under The Conservation of Habitats and Species Regulations, 2010.

3.4 This review has been undertaken as part of a wider coastal floodplain wetland habitat project (the Cresswell Report) and has identified that

“predicted future development-related habitat losses and associated disturbance events at Severnside could represent potentially significant impacts upon wintering gadwall (a Qualifying Species for the Severn Estuary SPA), and several other waterfowl species forming part of the Qualifying Assemblage (specifically gadwall, teal, tufted duck, curlew, mallard, lapwing and common snipe), which are considered to use a network of existing wetland and grazing pasture habitats. These potential impacts could occur through development at Severnside alone, or in combination with other plans and projects in the wider surrounds. Consequently, it is predicted that these impacts could give rise to potentially significant effects upon the integrity of the SPA and Ramsar site.”

3.5 In order to address the potentially significant effects, the Report 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. As these permissions are as yet only partially implemented, with the potential to have a significant effect on the SPA and Ramsar site designations, a review of these permissions is required under The Conservation of Habitats and Species Regulations, 2010.

Archaeology

3.6 The Severn Levels, which includes Severnside, is an area of high archaeological potential because of the level of preservation of archaeological and palaeo-environmental remains surviving within the waterlogged silt deposits and peat layers. Development at Severnside will inevitably result in the destruction of archaeological remains and could also indirectly affect water levels on adjacent land which could in turn affect the survival of waterlogged deposits.

3.7 Development of currently undeveloped areas may have a harmful impact on archaeology, however, the development of the 1957/1958 permission area is able to continue without the need for any archaeological mitigation. Elsewhere, site investigation will be necessary prior to development commencing. If archaeological or palaeo-environmental deposits are found during site investigation, an assessment will need to be made as to whether the foundations and groundworks for development

within the area need to be adjusted to take account of important archaeology. Where investigations reveal significant potential for important archaeological remains, a programme of excavation and recording, followed by analysis, report preparation and publication, may also be required as mitigation. If investigation reveals archaeology of national importance, it may be necessary to preserve this archaeology 'in situ'.

Flood Risk

3.8 The risk of flooding has been identified as a potential constraint to further development in Severnside and the adjoining area of Avonmouth. This risk can be summarised as:

- the majority of the area is at risk of tidal flooding and parts are also at risk of fluvial flooding;
- this risk is likely to increase with climate change, from increases in sea level, increased storminess and wave overtopping;
- the level of protection provided by the existing tidal defences is currently sub-standard and is likely to reduce significantly in the future due to the effects of climate change.

3.9 To date, and where planning permission has been required, the Council and the Environment Agency have worked positively, and dealt with planning applications on a case by case basis and:

- acknowledged that planning policies are supportive of proposals to redevelop previously developed land for employment development – B2, B8 and sui generis
- accepted that economic development generally met the requirements of the Sequential Test, on the basis that there were no alternative sites available at a lower risk of flooding in the area;
- accepted that employment development was “less vulnerable” and appropriate in Flood Zone 3a; and
- required on-site flood mitigation in the form of localised land raising and flood evacuation/emergency plans; and
- required that flood risk assessments demonstrate that development would not increase the risk of flooding elsewhere.

3.10 However, it is recognised that this approach is unsustainable in the longer term, particularly as raising land levels on new developments is likely to increase the risk and severity of flooding elsewhere. There is general acceptance that a strategic approach to flood defence is required and discussion is underway, with the support of the West of England LEP, between South Gloucestershire Council and Bristol City Council to achieve a long term, deliverable solution to mitigate the impact of new development in the Severnside area. A new strategic flood defence to a height of 10.74 m OD is one of the key recommendations in the Avonmouth Severnside Development Strategy Report at an estimated cost of £56.8 million (see Question 2 above) which also includes a project management delivery mechanism.

Q4 Are improvements to the transport system for this area sufficient, realistic and deliverable?

Council response – Yes

- 4.1 Some time ago, South Gloucestershire Council in co-operation with other local authorities, the Highways Agency and the landowners carried out an exercise to devise a masterplan for the transport infrastructure required to support development at Severnside. This forms the basis of the policy set out in the Core Strategy .
- 4.2 The Core Strategy identifies the transport improvements required for Severnside as being:
- i. The M49 Junction
 - ii. The Spine Road
 - iii. Link Road to the M49 Junction
 - iv. Local road improvements
- 4.3 In addition to the transport improvements identified in the Core Strategy and the Strategy Report, the Avonmouth and Severnside Integrated Development, Infrastructure and Flood Risk Management Study (Examination Library Ref: EB68) considered enhancement of public transport and opportunities to cycle and walk. However, it was recognised that enhancement of public transport was unlikely to be viable and that cycling and walking would not have a significant impact on reducing car trips.
- 4.4 From the studies that have been undertaken the Council is of the view that the improvements to the transport system are sufficient and realistic. The following paragraphs address the deliverability of these transport improvements.

Spine Road

- 4.5 The Spine Road is currently under construction (within the terms of the 1957/58 planning permissions) as far as the southern limit of Central Park (the distribution park development lying to the south of the Western Approaches distribution park and between the M49 and Avlon Works).
- 4.6 Discussions have been held with Bristol City Council to ensure that the Spine Road is extended further south. The intention is that the Spine Road will eventually link through to the A403 in Avonmouth.
- 4.7 A further link will be provided through the SITA waste recovery site, close to the boundary with Bristol City, to reach the A403. This link is a requirement of SITA's land purchase from SDLL, the major landowner of the remaining undeveloped land of the 1957/58 planning permissions.

M49 Junction and Link Road

- 4.8 The M49 Junction is identified by the LEP as one of 3 priorities for improvements to the Strategic Road Network within the West of England and the Highways Agency are currently undertaking a feasibility study to ascertain the location, design and cost for

the new junction. The LEP has also identified a new M49 junction at Avonmouth/Sevenside as a potential candidate for the West of England Revolving Infrastructure Fund through a funding award through the Regional Growth Fund. In addition, the Highways Agency has funding for pinch point schemes, where supporting economic growth is a key part of the assessment process. They are looking to produce a shortlist and the LEP has identified the M49 Junction as a scheme for the Highways Agency to assess for this shortlist. This scheme is currently being assessed by the Agency's consultants for shortlisting.

- 4.9 A link road to the new M49 Junction from the new Spine Road would also be required. Once the location for the new junction has been established, discussion will take place with the landowners to consider the implication for delivery of the scheme and links to the local road network, which will include proposals for how to link the junction to the spine road.

Local Road Improvements

- 4.10 Traffic management on the roads leading to Sevenside, particularly from the east, is an area where improvements are required to mitigate the impacts of traffic on communities along these routes. The Council is securing funding for off-site traffic management measures through S106 contributions from developers in the Sevenside area, although it is recognised that the ability to achieve this in the area covered by the 1957/58 permissions is limited).

5.0 Conclusion

- 5.1 Sevenside comprises a mix of industrial and former industrial areas and undeveloped greenfield land. Most of this land falls within the areas granted planning permission in 1957/58 to ICI. Sevenside is, however, subject to particular development constraints as a result of national and international nature conservation interests, flood risk, limited highway capacity and high archaeological interest. Within this context, and with the suggested changes, Policy CS35 provides an appropriate balance between facilitating further economic development at Sevenside and seeking to mitigate the environmental constraints. This is consistent with the Government's objective of encouraging sustainable economic development.

Appendix A

Suggested Modifications to Matter 23

Policy / Para.	Proposed Modification	Justification	Main (M) or Additional (A) Modification
CS35 (p199)	<p>Land at Severnside will be safeguarded and developed for distribution and other extensive employment uses, <u>including energy generation</u>, broadly in line with the extant planning permissions dating from 1957 and 1958.</p> <p>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 <u>continue to work with landowners, Bristol City Council, the Local Enterprise Partnership and statutory agencies to provide a strategic development framework which will help to deliver development while mitigating</u> site constraints, including flood risk, coastal protection, biodiversity, archaeology and transportation. <u>The Council will also work with individual landowners to help deliver those sites which contribute to delivery of a comprehensive and unified development.</u></p> <p>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.</p> <p>In the interim the Council will continue to work with Bristol City Council and statutory agencies to inform and develop mitigation strategies.</p> <p>The Council's strong preference is to</p>	<p>1) To reflect NPPF 2) Update</p>	M

Policy / Para.	Proposed Modification	Justification	Main (M) or Additional (A) Modification
	<p><i>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.</i></p> <p><u><i>Opportunities to enhance the sustainability of the area through, for example development of an energy grid, will also be explored and delivered where feasible.</i></u></p>		