

**SOUTH GLOUCESTERSHIRE CORE STRATEGY INCORPORATING POST
SUBMISSIONS CHANGES (PSC) SUBMISSION ON BEHALF OF BUSINESS WEST (BW)**

1. 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?

1.1 BW is of the view that Policy CS35 does need to be updated to take into account the recent Bristol City Council/South Gloucestershire Avonmouth/Severnside Outline Development Strategy 2012 (ASODS) and to link the future of this area with the proposed growth of the North Fringe so that the Bristol sub-region has a "northern arc" of higher value and diverse employment opportunities reaching from the Bristol and Bath Science Park in the east through the North Fringe to Severnside/Avonmouth in the west.

1.2 Such an update to the policy should incorporate a policy for the area to move towards higher value employment opportunities within Severnside as identified in scenario 3 of the ASODS – 50% logistics and distribution and 50% manufacturing. On the basis of a more balanced and diverse industrial mix, the study identifies the highest direct employment to be accommodated within Avonmouth/Severnside of 22,370 new jobs over the next 20 years. Furthermore, the area's status as an Enterprise Area assists in promoting it for diverse and sustainable economic development

1.3 However, BW believes that in order to induce a higher value form of industrial development, the PSC should have a more positive view on investigating and promoting transport corridors across the M5 between the North Fringe and Severnside including, within the plan period, a new junction on the M49 motorway to improve the servicing of land within Severnside. It is noted that the Ministerial Statement, Planning for Growth, urges authorities to "respond positively to wider opportunities for growth.." and BW is of the view that promoting these suggested transport corridors is a pre requisite to realising the enormous potential for diverse and higher value industrial development.

1.4 It is appreciated that funding for infrastructure is constrained by the 1959/1958 extant planning permissions and BW supports the Council's aim in ensuring the landowners work co-operatively with the local authority to best achieve/maximise opportunities within the area. In this regard, BW is willing

to play a part in establishing a working group for these purposes. However, the funding mechanisms identified in the ASODS should be further explored and promoted to assist in the delivery of much needed infrastructure.

2. In view of the extant planning permissions affecting land at Severnside is the Council's strategy for the area deliverable?

2.1 In BW's view, it is unlikely that the potential for growth in the area will be realised without addressing specific issues as identified in the ADOS report including the need for flood defences, ecological mitigation and particularly improvement to transport links including a new junction on the M49.

2.2 BW's view is that the Council should work with the current landowners and market indicators to increase the profile of the area with transports links to the North Fringe employment areas. BW believes that it is important to have a legible transport corridor that improves access by private and public transport from Severnside to the North Fringe, including Filton airfield as noted in our representation on Matter 14, to ensure that there are legible links between employment areas, housing areas and community services.

2.3 BW view's is that a local development document should be prepared for the Severnside area, in dialogue with the landowners, with a specific purpose to improve North Fringe/Severnside transport links and promote the area for sustainable and diverse economic development in the same manner as is proposed in policy CS25.

3. 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.

No comment.

4. Are improvements to the transport systems for this area sufficient, realistic and deliverable?

4.1 BW is of the view that the transport improvements proposed in the PSC, such as the new spine road and M49 junction, and the proposed means of delivery, is inadequate to generate a higher value employment profile for the

area linked as it should be to the North Fringe. Specifically, the research on funding options outlined in ADODS should be considered so that the M49 junction, in particular, is delivered within the plan period.

- 4.2 Furthermore, non motorway transport linkages do need to be considered based on higher value employment uses and with transport corridors that link the North Fringe with Severnside.
- 4.3 It is also considered that if the new road infrastructure proposed, such as the Avonmout/Severnside spine road and junction on the M49, is delivered, use of the motorway network by more local traffic would increase thus exacerbating existing problems on the local motorway network. However, connecting east/west roads between the North Fringe and Avonmouth/Severnside would assist in providing an enhanced public transport service as well as to enable vehicles to link with the North Fringe without using the motorway.
- 4.4 It is important that strategic transport infrastructure corridors are therefore identified within the North Fringe and Avonmouth/Severnside so that strategic decisions can be taken and such corridors are not specifically released for development thus hindering an overarching strategic transport network.
- 4.5 BW is of the view that policies CS7 and CS26 should be expanded to include a commitment to prepare a duly considered joint strategic transport plan/local development document that links Avonmouth/Severnside with the North Fringe. Such corridors could include a re-introduction of passenger services on the Hallen line/Henbury loop together with enhanced cycle road and bus connections between and through the two neighbourhoods.