

## **MATTER 23 – SEVERNSIDE – POLICY CS35**

### **Question 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 As demonstrated by the NPPF and Ministerial Statement, the Government is committed to ensuring the planning system does all it can to support sustainable economic growth by encouraging, rather than acting as an impediment to sustainable growth.
- 1.2 The Planning for Growth statement confirms that:
- “The Government’s top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government’s clear expectation is that the answer to development and growth should wherever possible be ‘yes’, except where this would compromise the key sustainable development principles set out in national planning policy.”*
- 1.3 As supported by numerous evidence based studies produced by South Gloucestershire Council and other parties, Severnside is a highly sustainable location for economic growth generated by industrial and storage and distribution uses. Severnside benefits from good communication linkages and easy access to the motorway network, rail and close proximity to Bristol Port and is already established as a local hub for manufacturing/industrial firms and environmental technologies.
- 1.4 The Avonmouth/Severnside Outline Development Strategy (April 2012), produced by WYG on behalf of South Gloucestershire Council and Bristol City Council, recognises that there continues to be strong local demand for storage and distribution accommodation within the locality. In recognition of the significant contribution that the development of Severnside can make to economic development over the next 30-40 years, the West of England Local Enterprise Partnership has designated Avonmouth/Severnside as one of its eEnterprise Areas.
- 1.5 The fact that policy CS35 allocates land at Avonmouth/Severnside for distribution and other employment uses broadly in line with the extant 1957 and 1958 permissions is therefore consistent with national policy.
- 1.6 However, policy CS35 goes on to propose that landowners voluntarily enter into Planning Performance Agreements with South Gloucestershire Council to agree a strategic strategy for Severnside and prepare Concept Statements to demonstrate how their individual sites fit within the overall Framework.
- 1.7 Whilst this is an admirable aim, where a planning permission exists development should proceed ‘without delay’ in accordance with the Framework and thus should not

be delayed by a local policy aim to enter into a PPA. Whilst Severnside Distribution Land Limited wishes to continue to work closely with the Council, they equally wish to deliver a sustainable economic development without delay in accordance with the Framework and 'Planning for Growth'.

**Question 2 -**

**In view of the extant planning permission affecting land at Severnside is the Council's strategy for the area deliverable?**

- 2.1 The Severnside Outline Development Strategy (April 2012) produced by WYG on behalf of South Gloucestershire Council and Bristol City Council presents evidence which demonstrates that the package of infrastructure and mitigation measures (transport, flood and ecology) required to deliver an optimum solution, and maximum economic growth at Avonmouth/Severnside can be supported in the majority by Tax Incremental Financing.
- 2.2 The remaining deficit (estimated at circa £33.8m) will need to be met from other sources such as the West of England's Revolving Infrastructure Fund, CIL, Regional Growth Funding, Local Enterprise Funding and where available private sector funding.
- 2.3 Given that a majority of the land is covered by the extant permissions the Council's strategy should not rely heavily upon funding from developers. Nevertheless, there is a clear rationale for public sector intervention to optimise the opportunities presented by Avonmouth/Severnside for economic growth, and national government are utilising and developing a range of financial instruments to stimulate development, which are likely to be highly applicable to this area.
- 2.4 Severnside Distribution Land Limited has invested heavily in the provision of the infrastructure necessary to deliver employment land under the 1957/58 planning permissions. They have provided:
  - A new speculative development of fully service land known as Central Park, Bristol. Details of the development can be viewed at: <http://www.centralparkbristol.co.uk/>;
  - A two kilometre spine road through the site running parallel with the Motorway as illustrated on the photograph attached at Appendix 1 on a speculative basis. This spine road has been an aspiration of the Council for many years and will enable the release of approximately 260 acres of fully serviced sustainable employment land;
  - The first phase of the spine road is shortly to be adopted by the Council: The remainder of the spine road will subsequently be adopted in phases;

- Serviced employment land available immediately to prospective employers: The first phase of the development is completed; with the construction and occupation of a 50,000sqft use class B8 building by Chap UK.

2.5 In addition to this Severnside Distribution Land Limited proposes to:

- Construct a road link between the new spine road and the A403 running parallel to the coast;
- This is a further significant investment in sustainable infrastructure in the location. The link road will complete the linkage of roads to open further areas of development land and will help deliver the Avonmouth/Severnside employment development area without delay during the plan period;
- This will ensure the delivery of the remaining land at Central Park.

2.6 Severnside Distribution Land Limited's strategy is to work collaboratively with South Gloucestershire Council, Bristol City Council, the Lower Severn Internal Drainage Board and Natural England in delivering sustainable economic development under the 1957/58 planning permissions and to address, resolve and where necessary mitigate any development constraints.

### **Question 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?**

3.1 A review of the 1957/8 Severnside permission, as permitted under the Habitats Regulations, was undertaken by Cresswell Associates and Hyder on behalf of South Gloucestershire Council (December 2011). In the absence of any specific details regarding how any future development proposals could affect habitats and specific, worst-case scenarios have been assumed.

3.2 South Gloucestershire Council has had the power, under the Habitats Regulations, to consider whether or not an Appropriate Assessment is required for a site with an extant planning permission. This power has existed for many years and if the Council considered such a review necessary they should have completed it 'as soon as reasonably possible'. The Council has not completed such a review as soon as reasonably possible, has been fully aware of the development taking place on the land and it is now assumed that either such a review will not be completed or that it has been completed and it has been concluded that an appropriate assessment is not required.

- 3.3 In any event, Severnside Distribution Land Limited has been working in full co-operation with South Gloucestershire Council, Bristol City Council and Natural England in delivering the infrastructure and development on the land, completing full Ecology Reports with mitigation strategies as part of the development. This work has been completed on a voluntary basis to ensure that best practice is followed. Copies of the Ecology reports and Surveys can be made available to the Examination if required.
- 3.4 The mitigation measures have included the provision of a sustainable drainage strategy, including the development of new Rhines alongside the new spine road. Similar practice will be followed with all future development.
- 3.5 All development is being designed to mitigate the possible impact of flooding through the development of sustainable drainage systems, including the provision of significant Rhines in consultation with the Lower Severn Internal Drainage Board, plus raising of development plots to ensure that they are free from flooding in the 1 in 100 year plus global warming event.

**Question 4 –**

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

- 4.1 The Avonmouth/Severnside development area is safeguarded by Policies CS11 and CS12 for employment use: It is the prime B8 distribution location in the Bristol area and is available for immediate development.
- 4.2 The delivery of employment land has, however, been constrained by the lack of investment in infrastructure, in particular the delivery of the much needed spine road and interconnecting highway infrastructure, plus the delivery of other services to the site.
- 4.3 Notwithstanding the current economic climate, Severnside Distribution Land Limited has invested heavily and on a speculative basis in the provision of infrastructure to deliver employment provision on the safeguarded land. This necessary infrastructure is sufficient, realistic and is being delivered today.
- 4.4 Further infrastructure is necessary, which will be delivered by TIF and other sources such as the West of England's Revolving Infrastructure Fund, Regional Growth Funding, CIL, Local Enterprise Funding and where available private sector funding, as described in answer to question 2. Severnside Distribution Land Limited is investing significantly in the delivery of the land at Avonmouth/Severnside and would not be doing so if it was not confident that the proposed improvements to the transport system were not sufficient, realistic and deliverable.

**New Spine Road and Development at Severnside**

