



Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL

T. 0117 9561916  
F. 0117 9701293

E. [all@tetlow-king.co.uk](mailto:all@tetlow-king.co.uk)  
W. [www.tetlow-king.co.uk](http://www.tetlow-king.co.uk)

Spatial Planning Team  
South Gloucestershire Council  
PO Box 2081  
South Gloucestershire  
BS35 9BP

Date: 21 May 2012

Our Ref: JA 94/0907-72

Your Ref:

**By Post and Email:**  
**[planningldf@southglos.gov.uk](mailto:planningldf@southglos.gov.uk)**

Dear Sir / Madam,

**RE: SOUTH GLOUCESTERSHIRE CORE STRATEGY – IMPLICATIONS OF THE NPPF ON REPRESENTATIONS**

**MCBRAIDA FACTORY, BATH ROAD, BRIDGEYATE (COMMENT ID. 4046401)**

Tetlow King Planning represents **McBraid PLC**, the landowner of **McBraid Factory**.

**Background**

On 6 August 2010, I submitted representations to South Gloucestershire Council on the South Gloucestershire Core Strategy – Pre Submission Consultation Draft dated June 2010. My representations related to Policy CS12, which safeguards McBraid Factory site for employment use. On 10 February 2011, I submitted further representations on the South Gloucestershire Core Strategy – Proposed Changes dated December 2010. On 26 May 2011, I submitted representations on the Core Strategy – Further Proposed Changes version and on the Government’s Planning for Growth Budget Announcement. Of particular relevance, on 8 September 2011, I submitted representations on the Government’s draft National Planning Policy Framework (NPPF). On 8 February 2012, I submitted representations on the December 2011 version of the Core Strategy.

**National Planning Policy Framework**

The Government recently published its NPPF on 27 March 2012. This further representation is in response to the Inspector’s invitation to explain how the NPPF affects my previous representations to extend the employment designation at McBraid Factory.

The NPPF explains that: *“There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles including: contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.”* (Paragraph 7)

Section 1 (paragraphs 18 – 22) of the NPPF seeks the delivery of sustainable development through building a strong, competitive economy.

It explains that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

Investment in business should not be over-burdened by the combined requirements of planning policy expectations. In drawing up Local Plans, local planning authorities should:

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

As previously indicated in our representations, South Gloucestershire Council has planned for too little employment growth in the East Fringe of Bristol. This will result in reduced potential for sustainable levels of development to meet employment demand and will also threaten to increase the level of commuting for South Gloucestershire and Bristol City residents to reach employment. Without such provision it is likely that growth will stagnate or be redirected to other areas in the region where additional provision is being made. For this reason, the Core Strategy is at risk of being unsound on the basis of failing to take full account of the evidence base and thus being unjustified and ineffective in its approach.

The NPPF requires local development documents to plan flexibly to accommodate any changes in economic circumstances. In light of the Government's commitment to encouraging development that supports economic growth through the planning system, we strongly recommend that my client's land is designated to encourage economic growth. The capacity of the site to contribute towards *"building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation..."* was set out in our earlier representations.

McBraid PLC supports the safeguarding of employment land at the McBraid Factory Site. However, we are also seeking the extension of the McBraid Factory site to include land to the south of Francis Way

which would enable the employment use to continue at the factory site. This land (as detailed in our representations on the Core Strategy Pre-Submission Consultation Draft June 2010) was historically linked with the factory until Francis Way was constructed to serve the new housing estate. The consolidation of the land to the south of Francis Way would allow the factory to continue operating within this locality.

The land south of Francis Way has historically been in employment use and was part of McBraida industrial site. It was only recently separated by the construction of Francis Way. Development of the land to the south of Francis Way would cause no significant losses to open areas of countryside and instead would provide significant benefits to the local economy through future development. For this reason we consider its allocation for employment land should be supported. By not doing so, the Core Strategy risks being found unsound on the basis of being inflexible and ineffective.

Yours faithfully



**JONATHAN ADAMS**  
For and On Behalf Of  
TETLOW KING PLANNING