

BRISTOL CORE STRATEGY EXAMINATION INSEPECTOR'S HEARING AGENDA

Issue 3 Economic development and Avonmouth - Thursday 24 June (9.30 start as previously indicated)

1. In my Preliminary Questions on this issue, I firstly set out questions concerning the evidence base before exploring matters relating in turn to offices, industrial and warehousing land and Avonmouth. Most of the comments from participants relating to the evidence base directly relate to each of the latter 2 matters. I have structured the hearing discussion around the 3 substantive topics I identified and will weave in consideration of the evidence base at each stage.

Office development

2. I have not seen substantive evidence challenging the overall approach to office development. The scale of new development to be accommodated is consistent the Employment Land Study (ELS) (CDE15). Given that, in the short term at least, economic growth is not as high as assumed in the ELS, it is reasonable to assume that the total office development proposed may not be achieved. This uncertainty is reflected in the Council's suggested change of prefacing the floorspace figures with *up to...* Any discussion?

3. The Council has also clarified that reference to 36,000 sq m of office floorspace in Town, District and Local Centres includes centres in South Bristol and is therefore a limited addition to the 50,000 sq m specifically allocated to this part of the City. I consider that this is useful clarification to avoid ambiguity in the policy wording. Any discussion?

4. Neither BCS1 nor BCS8 provide any guidance as to how/where the 50,000 sq m of floorspace for South Bristol should be accommodated (since this is additional to limited development in the local centres). Is this policy effective? Does it inappropriately leave difficult spatial choices to be resolved through the Site Allocations and Development Management DPD? Is the permission for 30,000 sq m of office space at Hengrove Park still extant? (Council's statement Issue 3.2 paragraph 13.) Is the lack of a spatial steer combined with uncertainty over any new centre for South Bristol (see Issue 5) likely to result in a dispersal of activity which should be concentrated in the most accessible locations? Which locations in South Bristol are likely to accommodate most of this development?

Industrial and Warehousing Land (outside Avonmouth)

5. The ELS identifies a need for 24.5ha of new land for industry and warehousing (outside Avonmouth). I have seen no evidence to indicate that there is no such demand. Informed representations consider that the need is greater. The Council consider the ELS to be robust. My understanding is that the Council do not question this assessment of need/demand, but do not wish to adopt all the recommendations of how this demand should be met. Is this correct?

Nover's Hill/Vale Lane PIWA

6. The ELS recommends up to 5ha in this location. The Core Strategy proposes 5-10ha. Despite my previous questions on the matter, I remain unclear how the Council has assessed the deliverability of this proposal. Is the land suitable for such a development? (I will be looking at the location before the hearing). The Council consider that there is no tension between the proposal and the designation of undeveloped land in this location under Local Plan policies NE1 and

NE2. I do not understand. Although the Council has suggested in its statement on Issue 6.3 that prominent and strategically important landscape features are not proposed to be designated in the future, the Core Strategy does not signal this intention and the designations remain extant.

Other possible/planned changes to provision for industry and warehousing

7. In response to my previous question (3.8) on this matter the Council indicates (Statement 3.1 paragraph 19) that it does not consider it appropriate or necessary to estimate the scale of new floorspace that would result from the type of development referred to in 4.8.15 of the Core Strategy. As a result, I am unclear whether the Council intends the Core Strategy to meet the demand for new industrial and warehousing land as assessed in the ELS or has accepted that it is unable to do so, or does not know whether the policies will do so. Please explain.

8. Neither the Preferred Options (January 2008) and the Preferred Options Review (February 2009) suggested that the needs identified in the ELS should not be met. What has changed?

9. Are there differences in meeting market needs between new land allocated for industrial and warehousing and redevelopment of existing sites or development within existing sites (as highlighted by the Council - statement Issue 3.1 paragraph 1)?

10. If the demand for industrial and warehousing land in the rest of Bristol is not met, does it matter? What are the likely implications for the economic and social objectives of the Core Strategy?

11. Policy BCS5 includes a contingency to accommodate up to 1,700 dwellings from mixed use redevelopment of employment land. I will have already explored some aspects of this under Issue 2. Here I want to explore the economic implications. Is it generally agreed that any such mixed use redevelopment is likely to result in the loss of land from industrial (B2) and warehousing (B8) use (even if employment levels are similar with the introduction of new B1 uses)?

12. The Council indicates that provision of up to 1,700 dwellings would need between about 34ha and 48 ha of land depending on density. Would the loss of land from industrial and warehousing use be greater than this because of the need to ensure compatibility of adjoining new employment uses with the residential element?

13. Given that the ELS concluded that only a few PIWAs were no longer fit for purpose would implementation of this contingency result in the loss of PIWAs that could still serve a useful economic role? Would the selection criteria for identifying such sites for redevelopment (4.5.14) be adequate to identify sufficient land?

14. The Core Strategy notes (4.5.14) that this contingency "has clear implications for the economic objectives of the Core Strategy". What are these and how serious?

Possible alternative provision of industrial land

15. Options for the provision of some new land for industry and warehousing were put forward at Brislington in both the Preferred Options (January 2008) and the Preferred Options Review (February 2009). The Council explains the difficulty of accommodating this alongside the scale of housing within the City boundary expected from the urban extension proposed in the emerging RSS (Statement on

Issue 3.1 paragraph 14). The Council also refer to the suggested industrial allocation being inconsistent with PPG2. What else has changed since the Options Review to prompt this different assessment of suitability under PPG2?

16 *If* (and I emphasise the *if*) the emerging RSS were to be withdrawn and the Council no longer proposed the south east urban extension in any form, would that change the Council's assessment of the suitability of an allocation for industrial and warehousing land at Brislington?

17 Are there any other strategic locations suitable for the allocation of land for industry and warehousing?

Wording of policy BCS8

18. Is the wording of the last paragraph of policy BCS8 consistent with the contingency to use some PIWAs for housing and the conclusion in the ELS that some designated PIWAs are no longer fit for purpose? Does the reference to the retention of non-designated employment land in certain circumstances fully reflect the Council's intention? Is the approach appropriate?

Avonmouth and policy BCS4

19. There are 3 main parts to the discussion. Firstly, clarifying the nature of the evidence about need/demand, available space for future commercial development and the opportunities/benefits of accommodating need/ demand in this location. Secondly, clarifying the nature of the constraints on development at Avonmouth and the implications for further development. Thirdly whether in the light of the first 2 matters, policy BCS4 is the most appropriate in all the circumstances and whether it will be effective.

Need/demand and space for further development

20. These matters would have benefited from a statement of common ground. At the hearing I look to parties to assist me in establishing the broad factual position, before moving on to the different conclusions that participants may wish to draw from those (hopefully) agreed facts.

21. Several parties have provided a copy of a report to the West of England Partnership, Planning Housing and Communities Board, March 2010 which includes consideration of the requirements for and available land at Avonmouth. What is the source of the Bristol-related data in this report? Are the facts and/or conclusions in this report agreed by the City Council?

22. There seems no disagreement in the evidence, or between the Council and other participants, that in recent years Avonmouth has been particularly attractive for the development of very scale storage and distribution uses; that this type of development has been a growth sector in recent years; and that demand for such premises will continue, commensurate with underlying changes in the wider economy. It also seems agreed that Avonmouth is suited to, and that there is a demand for, energy, waste and recycling projects (although compatibility between different types of land use is an issue). Is this generally agreed?

23. I would find it helpful if the Council could produce a summary schedule/table showing the evidence relied on in the ELS for the annual rate of development for different uses (but particularly B8) at Avonmouth, compared with the annual rate of development in the subsequent years. Even in the short time available, I would encourage the Council to discuss with the other participants on this topic a common basis for presenting this information.

24. Similarly, I would find it helpful for a table which compares the amount of pipeline supply which the ELS considered available and the opportunities which are now available. This table should list the sites previously referred to by the Council as being available, updated with any recent changes/proposals and taking into account the comments on these sites by Turley Associates on behalf of St Modwen Developments Ltd (1333), noting any disagreement in the assessment. This should also show what land constitutes the 87ha of available land (and the 50ha of which is considered committed) referred to at paragraph 22 of the West of England Partnership report. (I am assuming that the breakdown of these figures is readily available.)

25. The Port of Bristol has recently been given permission to develop capacity for larger ships. Has any decision been made on proceeding with this project. If so when is this project likely to be completed? How would this development change the demand for land at Avonmouth?

26. Overall, did the ELS significantly underestimate the expected demand for land at Avonmouth for either large format B8 or from the waste and energy sectors Has the pipeline supply of land significantly changed since it concluded that there was sufficient land.

27. To what extent is the need/demand at Avonmouth capable of being accommodated at Severnside? Has the Employment Land Study for South Gloucestershire been published and if so what assessment does it make of the ability of that area to accommodate demand?

28. How important for the objectives of the Core Strategy or the wider area is accommodating the demand for commercial development and energy/waste projects at Avonmouth? What are the consequences if demand is significantly restricted?

Constraints on development

29. *Flooding* is clearly an issue, but I am unclear what is the crux of the matter. In what way is it a constraint and does the nature of the issue change if development were to be proposed on new greenfield land? I would ask the Council and the Environment Agency (EA) to explain any concerns before a general discussion. (Eg what is it that new development proposals would be expected to demonstrate/achieve?) I do not understand why the EA say that "current tidal and fluvial hazard mitigation do not comply with the standards set out in PPS25 for new development" (Briefing Note: Flood Risk Management at Avonmouth/Severnside, Bristol 13 May 2010 TApp17 of Statement from Turley Associates). What assumptions underlie that statement in relation to the flood zone classification and the vulnerability classification of proposed development?

30. Is there a need for a strategic approach, such as the provision of new flood defences (if needed) which could not properly be addressed by piecemeal consideration of individual proposals? How realistic is the prospect of new flood defences?

31. *Highways*. Despite the statement from the Highways Agency and others I remain unclear as to the crux of the problem and the broad nature of mitigation that might be required. Discussion. I note that the HA state that "there is a reasonable prospect of a package of mitigation measures being identified for Avonmouth". Would any such package be deliverable and is there a need for a

strategic approach to mitigation including a financial contributions, which could not properly be addressed by piecemeal consideration of individual proposals?

32. *Nature conservation/European sites.* Has an Appropriate Assessment been made of possible industrial/warehousing/energy development on greenfield sites at Avonmouth? What is the nature/scale of "future development at Avonmouth" which is being addressed in the project by Creswell Associates (Hyder) referred to in the Council's statement (Issue 3.3 paragraph 2). Is it concerned only with possible development on brownfield sites?

33. Overall, is there is need for a co-ordinated approach to overcoming constraints and mitigation at both Avonmouth and Severnside?

Policy BCS4

34. Does the policy clearly express the Council's intentions? As indicated in the Council's statement and shown in the designations in the draft Site Allocations and Development Management DPD, the intention appears to be to extend the PIWA designation to cover all developed and committed sites (ie not simply retian the existing). If so, should this be made clear?

35. Is the Council opposed to new greenfield land or is simply not promoting/allocating it in the policy? Is the policy wording consistent with all the evidence

36. Is the policy approach the most appropriate taking into account all the evidence and current uncertainties?

37. Would the last paragraph be effective in helping to resolving the various constraints on development (or is it simply a statement of what planning should be achieving in any case). On current evidence, is there need or scope for the policy or to explain the nature of likely mitigation? Should there be greater reference to working with South Gloucestershire Council in relation to flood risk or transport?

38. The Council has accepted that the penultimate sentence of the policy should be amended to make clear that contributions to mitigation relate only to adverse impacts arising from the development. Any comment?

End of session

Simon Emerson
INSPECTOR
17 June 2010