Policy Title:

LP14 - Severnside Employment Area

Existing Policies Which adopted Core Strategy or Policies Sites and Places (PSP) policy would eventually be replaced	**Core Strategy Policy CS35 - Severnside**
Non-Strategic / Strategic	**Non-Strategic**

Purpose

This policy, in addition to the requirements of Policy LPS7 - Safeguarded Employment Areas, provides requirements for new developments coming forward within the Severnside Employment Area. It is a significant employment location of over 650 hectares, comprising predominantly large-scale warehousing and industrial uses, previously developed land, and greenfield sites not yet developed. Land East of B4055, Pilning Station is an additional proposed site allocation to complement this and provide further grow on space.

Together with employment developments at Avonmouth (within the administrative area of Bristol City Council) the Severnside Employment Area forms a globally significant enterprise zone at the Severn Estuary with strengths in net zero energy transition and logistics.

Outside of the defined employment area however, Severnside is a rural location where many people live. It includes five villages; Severn Beach, Redwick, Pilning, Easter Compton, and Hallen, as well as residential properties in the open countryside. It is crucial that economic benefits arising from the employment area should not come at the detriment to living conditions of residents in the wider area.

Severnside is also part of the Severn Estuary which provides for nationally and internationally important wildlife, reflected by its nature conservation designations, as well as having significant heritage assets.

Recent improvements to flood defences along the Severn Estuary maintain the current level of risk from tidal flooding up until the year 2098 at the 1 in 200 years flood event including an allowance for climate change. While this provides sufficient protection for employment uses, due to the flood risk level, Severnside remains unsuitable for uses more sensitive to flooding. Severnside's important ecological and heritage assets, as well as other major constraints include:

- National and international nature conservation designations relating to the Severn Estuary;

- Risk of flooding from the River Severn due to breaching or overtopping of the existing flood defences, coupled with a rising tide level, as well as groundwater flooding, fluvial flooding from the local rhine network, and surface water flooding;
- Limited capacity on the existing local highway network;
- High level of archaeological assets and potential assets across the Severn Levels; and
- Risks of mobilising contaminants, particularly those within land linked to the former long-established chemical and petrochemical industries, and associated landfills.

The continuing development of individual land parcels could cumulatively impact on these, and in particular:

- Have a significant effect on the ecology and conservation assets of the Severn Estuary and cause significant and irreparable damage to estuarine and floodplain ecology;
- Reduce flooding capacity and increase the risk of flooding to third parties;
- Damage the network of rhines which provide the local drainage network, and which are of ecological interest;
- Worsen traffic congestion on the local road and motorway network; and
- Result in the irretrievable loss of valuable archaeological assets.

The vision for the Severnside Employment Area is therefore that it will continue to provide a regionally significant employment location where employers, landowners and developers will work with the Council, other agencies, and Bristol City Council to unlock its economic potential and improve strategic and local transport infrastructure.

Further employment developments however must be designed and sited, and include schemes of mitigation, to prevent and manage all off-site impacts upon nearby residential communities and those which would impact upon the Severnside Constraints. The Severn Estuary and adjoining floodplain, internationally important for a wide range of ecological interests will be protected, and a network of new nature reserves implemented. The archaeological heritage and interest of the Severn Levels will also be protected and conserved. A longer-term strategy for managing flood risk and improving adaptation and resilience to the changing climate will be adopted.

Policy wording

1. **Land within the Severnside Employment Area will be safeguarded and developed for:**
   a. **Distribution and Industrial uses; and**
   b. **Uses focussed on net zero energy, adaptation and resilience to the changing climate; and**
   c. **Other uses meeting the requirements of Policy LPS7 - Safeguarded Employment Areas.**
2. **Development proposals at the Severnside Employment Area will be supported where they demonstrate:**
   a. **Mitigation of on-site constraints, and mitigation of the Severnside Constraints, without these resulting in harm elsewhere; and**
   b. **Land raising, and other on-site flood risk mitigation(s), proposed, would avoid increasing flood risk on land outside of the application site; and**
   c. **They contribute to a strategic development approach with existing and consented developments in the Severnside Employment Area; and**
   d. **High-quality design and landscaping which mitigates the impact of large-scale buildings and associated operations, including upon the surrounding landscape and residential communities; and**
   e. **That a Habitats Regulations Assessment of the proposals confirms that development will not have an adverse effect on integrity of the Special Area of Conservation, Special Protection Area or Ramsar sites or functionally linked habitats; and**
   f. **Biodiversity net gain and enhanced green infrastructure connections and assets; and**
   g. **Fully exploring, and where feasible deliver, opportunities to enhance the sustainability of the area.**

Supporting text

Background and Definitions

1. The **Severnside Employment Area** is shown on the Policies Map, and listed in Table 2 of Policy LPS7 - Safeguarded Employment Areas as comprising 7 parts:

   SEA45a - Westgate

   SEA45b - Central Park South

   SEA45c - Central Park

   SEA45d – Old Power Station Site

   SEA45e – Mount Park and Surroundings

   SEA45f – Central Park South East

   SEA45g - Land East of B4055, Pilning Station

2. The **Severnside Constraints** include, but are not limited to:

   a. Nature conservation designations related to the Severn Estuary;

   b. Tidal, Fluvial, and Ground Water Flood Risk;

   c. Highway Network Capacity; and

   d. Archaeological interest in the Severn Levels;

3. Where planning permission, or approval of details for extant permissions, is required criterion 1 of the policy ensures consistency with its Safeguarded Employment Area designation. This includes support for ancillary uses (such as for example food, drink and hotels) where they would complement and not undermine the primary function and specialism of the employment area. Development proposals should also be considered against other Local Plan policies, including those covering sequential and impact tests for main town centre uses, design, travel, climate, impacts upon residential amenity and upon amenity of other nearby uses, to determine whether they are appropriate in each location.

4. Criterion 2 of this policy directs development proposals to address on-site constraints, for example mitigating biodiversity impacts within the site itself. It also directs proposals to mitigate their impact, both individually and cumulatively, upon the Severnside Constraints (explained in further detail below) and in doing so comply with Conservation of Habitats and Species Regulations 2017 (as amended) (the “Habitats Regulations”). Regardless of consent status the Habitats Regulations require the competent authority to assess the implications of any proposed plan or project that is likely to have a significant effect on a European Site, and that is not directly connected with or necessary to the management of that site before deciding to grant permission. Consideration of these matters alongside details of the proposal is therefore practical, and in some cases both an Environmental Impact Assessment together with a Habitat Regulations Assessment may be appropriate.

5. In particular measures to address flood risk, such as land raising and/or attenuation areas, must clearly demonstrate they would not increase flood risk elsewhere nor result

in other associated detrimental impacts upon the wider locality such as harms to visual and residential amenity, landscape and the environment.

6. Individual land parcels brought forward in isolation can also cumulatively result in substantive negative impacts upon the wider area, including visually and upon the highway network. As set out in national policy, sustainable development encompasses a wide range of objectives, but for the Severnside area would particularly include protecting and enhancing the natural, built and historic environment, and incorporating opportunities for active travel. Criterion 2 therefore further directs development proposals to enhance sustainability and to manage and ensure cohesion with developments in other land parcels, including use of masterplans for large land areas. In doing so, together with mitigating site and Severnside Constraints, future development can align with the vision outlined in the purpose to this policy.

7. To achieve high-quality design and manage impacts upon landscapes and residential communities, development proposals must meet requirements of other Local Plan policies, including Policy LPS12 - Creating Well-Designed Places, and Policy LPS11 - Strategic Green and Blue Infrastructure and the Natural Environment, as well as currently adopted and saved Policies Sites and Places Plan Policies PSP2 - Landscape, PSP3 - Trees and Woodland, PSP8: Residential Amenity, and PSP21 - Environmental Pollution and Impacts (until replaced). In applying these policies to the Severnside Employment Area, with its predominance of large-scale buildings, new development should in particular:

    a. Demonstrate through the siting, form, scale, height, massing, detailing, materials and colour finishes, an integration with the character and appearance of existing built forms, the landscape, waterscape, and skies; and

    b. Secure robust, high quality and integrated landscaping, proportionate to the scale of development proposed, which is adequate to absorb the impact of large-scale buildings; and

    c. Demonstrate it would not have unacceptable visual and amenity impacts upon nearby residential communities.

8. The Council, jointly with Bristol City Council and other bodies, has commissioned several studies to understand constraints affecting the Avonmouth-Severnside area and how the economic potential of the area could be further unlocked. The following paragraphs provide more details of the major constraints.

Nature Conservation

9. In recognition of its nationally and internationally important wildlife, the Severn Estuary is subject to a series of nature conservation designations. It is a Site of Special Scientific Interest (SSSI), a Special Protection Area (SPA), and a Ramsar site (named after the Ramsar Convention on the Conservation of Wetlands of Importance). It is also a Special Area of Conservation (SAC) under the European Directive on the Conservation of Natural Habitats and Wild Fauna and Flora ('the Habitats Directive 1992'), implemented in Britain by the Habitats Regulations. The protection afforded to the estuary also extends to any land outside the designation used by European waterfowl. This presents a challenge in reconciling development at Severnside with continued use of the coastal floodplain by the species and assemblages of the Severn Estuary in such a way that it satisfies the Habitats Regulations and meets the conservation objectives of the site.

10. Under Regulation 63 of the Habitats Regulations the Council has a duty to review all unimplemented or partially implemented planning permissions likely to have a significant effect on the international nature conservation designations covering the Severn Estuary. This review of consent (Habitats Regulations Assessment) has been carried out as part of a wider coastal floodplain wetland habitat project (including land gifted under the scheme) in partnership with Bristol City Council and Natural England.

11. In order to address these potentially significant effects, The Avonmouth Severnside Enterprise Area Ecology Mitigation and Flood Defence Project (the "ASEA Project") has provided ecological mitigation in the form of newly created wetland habitats at Northwick and Hallen Marshes. New development proposals, and those from existing consents which require approval of their detailed design, will be subject to the Habitats Regulations and must be supported by a Habitats Regulation Assessment to demonstrate that they will not have adverse effects (including for example through habitat loss, pollution, disturbance, or impacts on bird flight paths).

12. Development proposals must meet requirements of Policy LP28 - Ecology and Biodiversity Net Gain, with expectation for onsite provision of mandatory 10% Biodiversity Net Gain, and requirements of saved Policy PSP18 - Statutory Wildlife Sites: European Sites and Sites of Special Scientific Interest (SSSIs) (until replaced). They may also need to contribute towards SAMM (Strategic Access Management & Monitoring) and on or offsite SANGS (Suitable Alternative Natural Greenspace).

Flood Risk

13. The ASEA Project covers 17km of improved flood defences which will maintain, up until 2098, the area's flood protection at the 1 in 200 year flood event (with 0.5% Annual Exceedance Probability), plus an appropriate allowance for climate change impacts such as rising sea levels. Irrespective of this, new development proposals will need to:

    a. Include Site specific Flood Risk Assessments and Surface Water Drainage Strategies taking into account the likely cumulative impacts of further development in the area and the effect on third parties; and

    b. Demonstrate active engagement with the Lower Severn Internal Drainage Board, Marine Management Organisation and the Environment Agency.

14. The Severnside Employment Area, together with other land along the Severn Estuary, is particularly susceptible to flooding from rivers, rhines, and ground water, with surface water flood risk also present. Land raising and mitigation(s) proposed to mitigate flood risk within the application site, should not increase flood risk elsewhere arising from all flood sources. This will need to be clearly demonstrated through site specific Flood Risk Assessments and Surface Water Drainage strategies. Saved Policy PSP20: Flood Risk, Surface Water and Watercourse Management (until replaced) provides further requirements for managing flood risk that development proposals must meet.

Archaeology

15. The Severn Levels is an area of high archaeological importance and potential because of the exceptional level of preservation of archaeological and palaeo-environmental remains surviving within the waterlogged silt deposits and peat layers. In addition, the waterlogged conditions have resulted in the exceptional survival of earthwork remains of medieval and post medieval field and drainage systems. Development within this area can result not only in destruction of remains within the immediate development area, but also indirectly can increase water levels on adjacent land affecting the survival of waterlogged deposits.

16. Where development is proposed within the Levels, geoarchaeological and archaeological investigation is expected. Some of this work can tie into ongoing geotechnical work, provided discussion with appropriately qualified archaeologists takes place when the specifications for the surveys are being agreed. At other times, however, dedicated geoarchaeological and archaeological investigations will be needed including geoarchaeological boreholes, geophysical survey and evaluation, to determine the presence and significance of archaeology and to formulate any further mitigation.

Highway Network Capacity

17. Traffic modelling demonstrates limited capacity within the existing local road network to meet traffic demand arising from new development at Severnside, resulting in congestion both within the Avonmouth/Severnside area and road links leading up to it. Use of Junction 1 of the M49 is therefore recognised as essential to realising the economic potential of the Severnside area. This junction was delivered in 2019 however, a 160m link road between this and Severnside Employment Area was not completed. It is therefore not currently connected to the local road network.

18. Planning permission for this link road to the western arm of the M49 Junction 1 of the M49 was granted in 2023 which, once delivered, would assist to address capacity issues in the local highway network. Longer term, connection to the eastern arm would provide more direct linkage to the Westgate part of Severnside. Whilst currently this part of Severnside is largely undeveloped, the pace of development is anticipated to significantly increase over the plan period. Proposed site allocation: Land East of B4055, Pilning Station, would provide additional development opportunities to the east of Westgate, and similarly require use of an eastern arm connection to M49 J1.

19. A large section of north-south spine road through the Severnside Employment Area has been completed within Central Park. Subject to partnership working, including with Bristol City Council and the West of England Mayoral Combined Authority, continued southward extension to Severn Road may further improve highway network resilience and enhance the convenience of sustainable travel options.

20. While the Council will seek to direct HGV movement to the main routes to and through the area, employee related trips are more likely to use the local road network. The use of the motorway network for short commuter trips is also likely to increase. Use of the M5 junctions 16 and 17 via the adjoining minor road network by Severnside development traffic would be of particular concern to the Council. Ambitious travel plans for staff and visitors of new developments will be encouraged to minimise car-based travel and thereby assist in meeting requirements to mitigate the impact of new

development upon the highway network. Proposals will additionally be considered against Policy LPS9 - Sustainable Movement and Transport Infrastructure.

21. There are some existing, although limited, public transport options in the area with bus services between Central Park, Cribbs Causeway and Parkway Railway Station. Severn Beach Railway Station lies 1km from Central Park, and up to 4km from other parts of the Severnside area, with train services to Bristol Temple Meads. National Cycle Network Route 4 runs between Severn Beach, Central Park, over M49 J1 through to near Easter Compton and Cribbs Causeway. Future public transport network provision would need to support anticipated job roles and shift patterns.

22. Future large-scale development will also be expected to come forward with comprehensive transport delivery plans which includes significant improvements to bus and rail services between Severnside, Avonmouth, Bristol, and the wider West of England Region.

Partnership Priorities

23. The coastal floodplain of the Severn Estuary is internationally important for protected species of migratory wildfowl, waders and fish. It straddles the boundary between Severnside and Avonmouth in the administrative area of Bristol City Council. The Council will work with:

    a. Bristol City Council and Natural England to carry out a Habitats Regulations Assessment on any new applications under Regulation 63 of the Habitats Regulations.

    b. Bristol City Council, Bristol Port Company, RSPB, British Trust for Ornithology, Natural England and Avon Wildlife Trust regarding allocating land for Local Nature Reserves.

    c. Linking the Levels, a landscape scale nature recovery partnership project funded by the West of England Mayoral Combined Authority which aims to restore nature across the Lower Severn Vale, levels and shore of South Gloucestershire. The project is led by South Gloucestershire Council and builds on the A Forgotten Landscape project.

    d. The Severn Estuary Partnership (SEP), which supports planning, management, and development of the Severn Estuary for all who live and work here. This includes co-ordination of the ASERA Management Plan, the Shoreline Management Plan and the Severn Estuary Strategy.

    e. Bristol City Council, the West of England Mayoral Combined Authority and Local Enterprise Partnership, Landowners, Natural England, Environment Agency, Marine Management Organisation and the Highways Agency to agree a strategy for development and secure funding for the strategic infrastructure.

    f. The West of England Mayoral Combined Authority, Bristol City Council, North Somerset Council, and Bath and North East Somerset Council, to deliver improved public transport provision, including more frequent rail services from Severn Beach Station and improved bus connectivity across the region.



Figure 1. Severnside Employment Area

Additions	
Key evidence	The Avonmouth Severnside Enterprise Area Ecology Mitigation and Flood Defence Project
Other relevant policies to cross-reference?	Policy LPS11 - Strategic Green and Blue Infrastructure and the Natural Environment Policy LP28 - Ecology and Biodiversity Net Gain Saved Policy PSP18 - Statutory Wildlife Sites: European Sites and Sites of Special Scientific Interest (SSSIs) (until replaced) Saved Policy PSP20 - Flood Risk, Surface Water and Watercourse Management (until replaced) Saved Policy PSP17 - Heritage Assets and the Historic Environment (until replaced) Policy LPS7 - Safeguarded Employment Areas Policy LPS9 - Sustainable Movement and Transport Infrastructure Policy LPS12 - Creating Well-Designed Places Saved Policy PSP2 - Landscape (until replaced) Saved Policy PSP3 - Trees and Woodland (until replaced)