

Matter 8 (Ref: 498035)

**CHRISTCHURCH & EAST DORSET CORE STRATEGY
HEARING STATEMENT FOR MATTER 8**

ON BEHALF OF:

STOURBANK NURSERIES LTD

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Submission Version

This document provides our Hearing Statement for Matter 8. It includes below a summary of the four key components of the overall case on behalf of Stourbank Nurseries because, in this way, we are able to illustrate the lack of (a) engagement and (b) objective assessment undertaken by EDDC and, in turn, the consequences this has for the 'soundness' of the plan.

The four key components at the centre of our objections, and which build the case for 'unsoundness', comprise:

1. Lack of engagement during the preparation of the plan - eg no contact since 2010, despite the submission of a 22 page case on behalf Stourbank Nurseries.
2. Insufficient evidence - key issues on the Green Belt and the economy have not been objectively assessed.
3. As a result of (1) and (2) above - an unsound strategy.
4. Leading to our principal objection to the CS - that the CS is 'unsound' because Stourbank Park has been omitted from the employment allocations. Put another way, the CS:
 - a. Has **not been positively prepared** (with the economy or our representations in mind).
 - b. Is **unjustified** (because the Green Belt and ELR evidence is seriously deficient).
 - c. It will be **ineffective** (because Blunt's Farm is a blunt mechanism to deliver the varied employment and economic development needs of East Dorset which, in any event, have not been properly assessed).
 - d. Is **not consistent with national policy**, notably paragraphs 7, 9, 14, 17, 18 to 21 and 28 (on positive plan-making, sustainable development and the role of the economy), paragraph 83 (no plan-wide Green Belt Review and no assessment at the site level of the intended permanence of Green Belt boundaries in the long term), and 155 (meaningful engagement and collaboration with business interests).

Our principal area of focus for our objections, where we feel our case cannot be refuted, relates to the economic evidence. Bloombridge has very substantial experience in the delivery of jobs, inward investment and economic development – see the Appendix to this document. We have wanted to engage with EDDC in order to set a robust process for assessing the needs of the East Dorset economy and (then) a strategy based on, and justified by, these needs. We would have pointed to best practice in the preparation of ELRs and issues such as segmenting the employment needs of the district, planning for the rural economy, providing a flexible approach and a choice of sites, understanding the take-up rates of different types of employment land/need, and assessing the proposed employment allocations against the needs of the district. This work has not been undertaken by EDDC and is not part of the evidence base for the CS.

We request that the Inspector modifies the CS to provide for employment development at Stourbank Park (see our **proposed new Policy FWP9** included with our 22 June 2012 representations). The evidence in support of this new policy (on Green Belt and employment grounds) is set out in *Stourbank Park, Wimborne: A Compelling Case* (May 2010). Further advocacy of this case follows in this Hearing Statement.

The Green Belt (see also our Hearing Statement on Matter 2)

The East Dorset Landscape Character Assessment notes that Stourbank is “screened from view by intervening woodland” (page 42); which suggests a better, lower impact outcome for the Green Belt than Blunt’s Farm, or even housing sites such as West Parley. Combined with the fact that the glasshouses comprise previously developed land, we feel that the rudimentary case for the release of Green Belt land is strong. The economic needs, particularly the contribution that Stourbank Park can make to the rural economy and, in the alternative, the current failure of the CS to provide for the future of a long-established rural business in this location, provide the necessary ‘exceptional circumstances’. Put another way, the CS can accommodate a local need with, in our view, far less impact on the Green Belt, AONB or SSSIs than the preferred options in the CS.

The Economy

Putting the Green Belt issue to one side, it is also possible to make the case for Stourbank Park through a critique of the CS evidence base on the economy. In particular, the ELR1 and Workspace Strategy 2012, which only deal with quantitative issues (ie generic demand). That is not an effective approach, given the role of supply and the need to disaggregate demand (eg by size, type, location etc). One of the authors of the Workspace Strategy, Anne Gray (Principal Consultation & Research Officer at Dorset County Council), described the purpose of the 2012 revised evidence as “an empirical quantification of need, not a strategy for how it should be attributed” (email dated 22 June 2012, now issued to the Programme Officer). Put another way, the evidence is not in a form that can be used to make judgements on which sites should be allocated, for what uses, and how much should be allocated in each case (to match demand with supply over the plan period). In fact, best practice often advocates an over supply in aggregate in order to offer employers/investors a choice of location (and competition on rents and quality). The CS underperforms in relation to all of these aspects.

One of the points made in our representations submitted on 22 June 2012 (ie on Chapter 3 - Challenges, Vision & Strategic Objectives) is that East Dorset’s Economic Development Strategy needs to provide a segmented and targeted approach to employment development; on the basis that choice and flexibility for potential employers/investors are key criteria for successful employment development. This is much more than a simple **quantitative** assessment (ie ELR1, as above). We would suggest that EDDC has not complied with the approach set out in CLG’s *Employment Land Reviews: Guidance Note* (2004).

It is clear that a *positively prepared* plan, which is *justified* and *effective*, needs to take economic and employment issues way beyond quantitative issues and address **qualitative** issues. This is because employers come in many shapes and sizes such that the take up of space (ie demand) is very sensitive to locational criteria, size of units, neighbouring uses (clusters), price, lease obligations, access to markets/customers etc. In these terms, East Dorset's Economic Growth Agenda needs to be targeted and market-orientated, and it should be a leading and fundamental part of the CS. The ELR Stage 1 and Workplace Strategy just translate predicted demand into a generic quantum/allocation, as opposed to Stage 2 and Stage 3 ELRs which would also test that predicted demand is actually matched by take-up rates on the ground (on a park by park or use by use basis). See paras 1.4, 8.6 and 11 of the ELR – ie its terms of reference do not address the evidence needs of the CS. This omission is a fundamental failing of the CS, not least given the importance that national policy attributes to building a strong, competitive economy (para 18 et seq of the NPPF). Moreover, in a rural economy like East Dorset, paragraph 28 of the NPPF is particularly relevant as it encourages authorities to “support economic growth in rural areas”, “support the sustainable growth and expansion of all types of business and enterprise in rural areas” and “promote the development and diversification of agricultural and other land-based rural businesses”. EDDC’s evidence is too generic, and lacks the granularity, to distinguish between the case for the large format industrial and trading estate uses at Uddens and Ferndown, compared with the needs of SMEs and rural businesses, perhaps at Stourbank Park. This is not something that can be left to lower order or site allocation DPD as the CS needs to (a) provide a sound strategy (b) match supply and demand in quantitative and qualitative terms, including a clear plan for SMEs and the rural economy and (c) address any constraints to growth, such as the need for selective or localised Green Belt reviews. The latter point is especially important in relation to established business sites such as Stourbank (where, in the absence of an allocation, the business cannot plan for the long-term given the costs and risks associated with promoting development in the Green Belt on the basis of ‘very special circumstances’).

Implementation Issues

One of the advantages of Stourbank Park is that it is ready now for development. It may need some additional infrastructure in the future, but an ‘organic’ fairly slow rate of development (matching the evolution of the nurseries business) can start immediately, and build over time – assuming the business is not constrained by the Green Belt. This contrasts with the very large allocation at Blunt’s Farm that will require substantial upfront infrastructure, as well as awkward mitigation works in relation to the landscape and visual impact (loss of forest) and potential impact on the SSSI. By way of example, Cobham Gate requires £4m of upfront infrastructure, with only £2.5m possible from the RGF/LEP. The implementation plan for Blunt’s Farm is not readily available from the evidence. We suspect it is expensive and undeliverable in the short term.

Without what the market would describe as ‘oven ready’ sites, potential inward investment will be lost. Market enquiries from employers/investors rarely stay live for more than 2 years (for example because of the need to manage change with employees, suppliers and customers) so if an allocated site is not consented and serviced the enquiry will move on to another location (or not be contemplated in the first place). This

results in a poor outcome for planning, with new jobs or new inward investment lost to East Dorset or with existing employers suffering owing to an inability to expand, change or consolidate.

On the question of 'soundness', what evidence can EDDC table to demonstrate that the CS does not allocate the wrong places or the wrong type of employment development or both? On the basis of historic take-up rates for Uddens and Ferndown, how many years supply is provided for by the 30 hectares at Blunt's Farm?

If the evidence (as illustrated above) is insufficient then it must follow that the strategy for the CS is either unsound or (by some measure of luck for EDDC) sound, but based on the wrong evidence. This is where the lack of engagement is relevant.

An Unsound Strategy

If there had been engagement then our proposals (both in terms of the economic evidence required by EDDC and also the site that we have suggested) could have been reviewed and objectively assessed; leading to a better outcome. We note that 'fairness' is not a criteria for 'soundness', but a failure to comply with paragraph 155 of the NPPF is not only **inconsistent with national** policy it is also poor planning. This is why we have no option but to request that a modification is made to the CS (as below). This may not make the CS sound, but it will remove our objections. This is also why we raised this matter at the Pre-EIP Meeting – in order still to give EDDC time to properly consider points we first put to Officers in May 2010.

Following the questions we asked at the pre-EIP meeting, and the direction we received then from the Inspector, we spoke immediately to Richard Henshaw at EDDC (who was in attendance). He said that the Green Belt Review is on the EIP website and in the Background Papers and that the ELR2 may now be available. **We have not been able to find these documents.**

We respectfully suggest that any Green Belt Review should have addressed the Green Belt from a district-wide perspective such that it informed the baseline evidence for decision making on the plan and strategy; and it should have been available to help decide upon the relative impacts of the various site allocations (both preferred and non-preferred). Our concern is that the/any Green Belt analysis has been undertaken retrospectively to help reinforce decisions made rather than inform choices. The same conclusion appears to be relevant to the ELR2 and ELR3 – where, again, fundamental components of the evidence base were not available at the time that decisions on the overall strategy and site allocations were made. In these terms, **the CS is fundamentally unsound – the strategy and site allocations cannot be justified by the evidence because the evidence is not, or was not, available.** It follows that the CS has **not been positively prepared** and it will **not be effective.**

Stourbank Park – An Omission from the Employment Allocations

In light of the above, and our full review of EDDC's evidence base, we remain convinced that there is a compelling case for the allocation of Stourbank Park. This will help promote a strong rural economy, it will solve a fairly difficult business issue for Stourbank Nurseries (ie the long term investment strategy for the site and glasshouses), it is likely to be an attractive location for local, small scale employers, entrepreneurs and start ups, and it will provide a useful counterbalance to the large scale (and very different) allocated sites at Uddens, Ferndown and the Airport.

In short, we are requesting modifications to the CS which:

- a. Remove Stourbank Nurseries from the Green Belt and/or
- b. Allocate the glasshouses for employment purposes.

In terms of the landowner's objectives, either of these two outcomes will assist the gradual diversification of the business (to include, for example, a farm shop and business units for SMEs), helping the nurseries business to grow and evolve, retaining the existing local employment, whilst also making it easier to plan for the long term maintenance and renewal of the c25,000 square metres of glasshouses, some of which are more than 40 years old.

This could be achieved by taking 5 ha from Blunt's Farm, still leaving a very major and very long term allocation of 25 hectares. We do not know how many years supply this will leave; because the ELR does not provide the evidence. We are not aware of any major take-up at Uddens or Ferndown in the last 5 years, but based on our experience with Arlington Securities (see the Appendix) we might suggest that a take-up rate at Blunt's Farm of 1 hectare per annum might be achievable (on a 10 year average). 'Losing' 5 hectares to Stourbank Park will therefore still ensure an over supply of employment land at Uddens and Ferndown for the plan period: hence, there is **no loss for the employment diversification gained**.

In short, our proposed modification(s) would have no material impact on the outcomes sought by the CS, including in relation to the Green Belt, but modifying the plan would remove our objections, and (in accepting the evidence that we submitted in May 2010) help to make the strategy in the plan sound and, in particular, responsive to the needs of Stourbank Nurseries (and, generally, the rural economy). It is difficult to see how, or on what basis, our proposed modification(s) could (or should) be resisted.

Conclusion

We have set out in this Hearing Statement why we consider the CS to be 'unsound'. We have also indicated that our objections can be removed by a modification that takes Stourbank Park out of the Green Belt, or allocates it as an employment site. A further (though non-preferred) outcome is for the land to be 'safeguarded' pending, for example, the demonstration of employment need or the lack of progress with the deliverability of Blunt's Farm. A variation on this outcome is for the CS to build some flexibility into the

employment strategy by making it clear that, say, 10 hectares (netted off the proposed allocations) will be consented during the plan period for local business parks on small scale, unallocated sites. The definition of exceptional circumstances in the CS could be amended accordingly.

2616 words

APPENDIX: Relevant Employment & Economic Development Experience

As a general observation we feel it is worth noting that planning for the economy and employment is a specialist area where, given the typical focus on housing numbers and housing allocations at most EIPs, in consequence, best practice on economic development is often overlooked. In our opinion, this is a major failing of the planning system and it is a limiting factor on an authority's ability to plan for mixed-use sustainable development which is well-directed and realistic in terms of what the market and investors will bear.

Bloombridge is probably the UK-leader in the planning of business parks. We have not only planned the largest business parks in the country, when we were Main Board Directors of Arlington Securities (now Goldman), but probably achieved permissions for more business parks than anyone else – from Aberdeen (BP's HQ) to Solihull (Birmingham Business Park) and Bristol (Aztec West). Our experience and opinions should therefore carry weight in the EIP process.

Example projects in the last five years include:

- Silverstone Circuit, comprising 400,000 sq m of business and leisure space
- The McLaren Applied Technology Centre (30,000 sq m in the Green Belt)
- Oxford Technology Park (25,000 sq m taken out of the Green Belt)
- The Northern Gateway, Oxford (50,000 sq m taken out of the Green Belt)
- Uxbridge Business Park (8,000 sq m extension into the Green Belt)
- Eastside Locks, Birmingham (140,000 sq m regeneration project)

For all of these projects we have worked closely with agents and local planning authorities, often supplementing their ELRs with market appraisals and detailed economic assessments produced by specialist consultants such as SQW and Ramidus. SQW's work on Silverstone identified that the consent would deliver 8,400 jobs – and this strategy and statistic has been instrumental in making the case for RGF/LEP infrastructure funding. We respectfully suggest that East Dorset's approach falls a long way short of what other authorities have achieved – impacting on the effectiveness of the CS. To be clear, we consider that EDDC's approach is 'unsound'. It does not provide for exceptionally valuable rural employment assets, such as Stourbank Park. An example from the Oxford Green Belt that illustrates what could be achieved at Stourbank comprises: <http://www.wortonfarms.co.uk/business-park.html>. This contains a variety of small businesses along with rejuvenated rural activities such as livery and organic farming.

For further information on Bloombridge, see www.bloombridge.com