



NORTH DORSET LOCAL PLAN Part 1 – 2011 TO 2026

REPRESENTATIONS ON BEHALF OF THE DAVIS COATS FAMILIES (ID NO 3079)

HEARING SESSION – Tuesday 17th March – 14.00

Issue 6: The Countryside (policy 20) – including policies 28 – 33

Introduction

1. This statement is submitted on behalf of the Davis Coats families in relation to land to the north east of Blandford. The identification of this area for development is supported. The site suitable, available and deliverable. It is in the control of the Davis Coats families and supporting documents have been provided to Council as part of the local plan process.

Response to Questions

6.1 *Is sufficient support given to sustainable economic growth in the countryside (NPPF paragraph 28)?*

2. **Paragraph 28** of the NPPF (the government's current planning guidance) and its first bullet states:

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*

The Davis Coats land is currently outside the Blandford settlement boundary in the countryside. The proposals promote mixed use development, including an easterly extension of the Sunrise Business Park.

3. Paragraph 28 is obviously very supportive of economic development in rural areas.
4. We note the Council quite correctly recognises the importance of the NPPF in the Pre-submission Local Plan and reflects this in **Policy 1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**.
5. Policy 1 states, amongst other things, that:
 - *The Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.*
 - *The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.*

- *Planning applications that accord with the policies of the Local Plan will be approved without delay, unless material considerations indicate otherwise.*

6. Paragraph 6.12 of the Local Plan in respect of **Economic Development in the Countryside** states:

The key elements of the Council's approach to economic development in the countryside (including Stalbridge and the District's villages) are:

- *to enable rural communities to plan to meet their own local needs primarily through neighbourhood planning; and*
- *to support certain forms of economic development through countryside policies including those relating to: the reuse of existing rural buildings; **the small-scale expansion of existing employment sites**; equine-related developments; and the provision of rural tourist accommodation (Policies 29 to 32).*

(Our highlighting and underlining)

7. Paragraph 6.13 goes on to state that:

This approach seeks to support and diversify the economy in the countryside to meet local, rather than strategic needs. Neighbourhood plans could allocate specific sites for economic development to enable local communities to meet their own needs, if they cannot be met through countryside policies alone.

8. The site north of the bypass is submitted as part of a comprehensive mixed use scheme and would provide a significant expansion to Sunrise Business Park. There are already prospective users for the land, and there have been initial discussions with planning officers regarding these proposals. Whilst our proposal for a potential strategic allocation, however, in the absence of that it is important that other relevant policies are worded in a supportive way.
9. **Policy 11: The Economy** of the emerging plan is supportive but perhaps not to the same degree as Policy 1. Under the policy text for **Spatial Approach to Economic Development** it states:

The economic development of the four main towns (including Blandford) will be supported by:

- a. The development of key strategic sites to meet the identified need for employment

Economic development in the countryside (including at Stalbridge and the District's villages) will be supported by:

- d. *enabling rural communities to plan to meet their own local needs, particularly through neighbourhood planning; and*
- e. *countryside policies (Policies 29 to 32) which may permit: the re-use of existing buildings; **the retention and small scale expansion of existing employment sites**; the provision of certain forms of tourist accommodation; and equine-related developments.*

(Our highlighting and underlining)

10. Our ideal is to have the site allocated as a strategic mixed use site which to some extent would be in accord with Policy 11, as well as a revised Housing Policy 16. (See separate representations on this policy)

11. Under **Jobs, Employment Land and Sites for Mixed Use Regeneration** of the policy text for Policy 11, five key strategic sites have been identified, primarily for employment uses. Two of these are in Blandford:

f. Part of the Brewery site, Blandford St. Mary (3 hectares);

g. Land off Shaftesbury Lane, Blandford Forum (4.8 hectares);

12. The first of these sites was identified in the 2003 Local Plan and has been very slow to develop out. The second includes the Hospital Metalcraft site, which the Council has now granted planning permission for an ASDA supermarket.

13. Our representation on behalf of the Davis Coats families dated 23 January 2014 (ID3079) stated:

Policy 11 and Policy 30 need to be made consistent to allow for the extension of all sites in the countryside. We specifically comment that Policy 30 should be redrafted to allow for extensions to established business parks and industrial estates in order to provide opportunities for existing businesses to expand, without the need to relocate, and possibly to cater for other businesses looking to locate to the area. This would help to ensure a flexible approach to employment land provision to meet varying business needs over the plan period.

Blandford is one of the four main towns that Policy 2: Core Spatial Strategy focuses development on. As such, an extended industrial site (mixed use), adjacent to the built form of the existing industrial estate, in this very accessible location has many benefits. It has good road links, is on the route of a bus service, it is close to population centres and has the ability to service a wide area in terms of customers.

14. Representations made in 2010 on the Economy were consistent:

Core Policy 6 should provide for extensions to established business parks and industrial estate in order to provide opportunities for existing businesses to expand without the need to relocate outside the area, and attract new businesses looking to locate to the area. Such an approach would help to provide a flexible and responsive supply of employment land ...

In particular opportunities for the extension of the sunrise Business Park at Blandford should be identified in line with our comments on Core Policy 15

15. In the commentary on Core Policy 15, a masterplan is highlighted which provides a 3.0 hectare employment site, forming an extension to the existing Sunrise Business Park.

16. In reps on behalf of the Davis Coats families submitted in 2012 the following point was made:

The SHMA household forecasts make no attempt to reconcile housing provision with economic growth and employment aspirations. This represents a significant shortcoming in the evidence base; the link between economic growth and housing provision should not be ignored. A particular feature of the household forecasts for North Dorset is the forecast decline in the working age population by around 7%, combined with a significant increase in those aged over 60 (a 30% increase in 60-74 age band and an 88% increase in the 75+ age group), as indicated in figures 7.7 and 7.8 of the SHMA. This raises the risk that the area may face a labour shortage which would have implications for economic growth and travel patterns, and highlights the need for more appropriately size market and affordable dwellings.

17. On Employment the following representation was made:

Provision should be made to allow for extensions to established business parks and industrial estates in order to provide opportunities for existing businesses to expand without the need to re-locate, and to attract new businesses looking to locate to the area. This would help to ensure a flexible approach to employment land provision to meet changing business needs over the plan period.

In particular, Blandford has the highest proportion of working age population of the District's market towns and plays a key role in the economic sustainability of the area and we would highlight the opportunity for the emerging plan to make provision for a small scale extension of the Sunrise Business Park.

18. For proposals which involve the extension of existing industrial sites, Policy 1 espouses the very the supportive policies of the NPPF and Policy 11, whilst being relatively supportive, cross refers to policies 29-32, which specifically support the small scale expansion of existing employment sites. The most relevant policy, **Policy 30: EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE** is overly restrictive and does not sufficiently reflect the sentiments of the NPPF or the more positive wording in Policy 1 and 11.
19. Whilst Policy 30 is supportive of the extension of an existing building, the construction of a new building or the redevelopment of buildings or the site as a whole, this support, however, only refers to '*within existing employment sites*' and is then subject to six criteria, some of which we maintain are also overly restrictive and are contrary to the spirit of the NPPF and Policy 1 and 11.
20. Our client maintains that Policy 30 and its criteria do not reflect the much more positive guidance contained in the NPPF or the more positive wording of Policy 1 and 11. As a result, we would maintain that the Local Plan fails the test of soundness in respect of this policy.
21. Policy 30 is even more restrictive than Policy 3.5: Employment Development within the Countryside of the North Dorset Local Plan 2003, notwithstanding the subsequent introduction of the NPPF. Policy 3.5 at least allows a *small scale extension to an established site*.

How the Plan can be made sound

22. Policy 30 should be redrafted to allow for extensions to established business parks and industrial estates, in order to provide opportunities for existing businesses to expand, without the need to relocate, and possibly to cater for other businesses looking to locate to the area or within the area. This would help to ensure a flexible approach to employment land provision to meet varying business needs over the plan period.
23. As Blandford is one of the four main towns that Policy 2: Core Spatial Strategy attempts to focus development on, the proposed extension to Sunrise Business Park is very close to the main town of Blandford, as such, an extended industrial site, adjacent to the built form of the existing settlement, in this very accessible location has many benefits. It has good road links, is close to the route of bus services, it is close to population centres and it has the ability to service a wide area in terms of customers.
24. Extension to the Sunrise Business Park would be sustainable development, which should be facilitated by both Policy 30 and in its wider context as part of a mixed use development that should be a strategic allocation within the Plan under a revised Policy 16.
25. Our suggested wording of a revised Policy 30 would be:

For ~~Within~~ existing employment sites in the countryside, appropriately scaled expansion of the site, the extension of existing buildings, the construction of new buildings, the redevelopment of buildings or the site as a whole will be permitted provided that:

- a the existing development and use is lawful; and
- b ~~the extent of the site in lawful employment use (including ancillary uses) is not increased; and~~
- b the development would not include or give rise to ancillary uses within the site, such as open storage, that would be visually intrusive, or would not

give rise to ancillary uses that could not be accommodated within the site;
and

- c the development is of a size, scale and design that is not ~~more~~ visually intrusive in the landscape ~~than the existing development~~ and respects the immediate setting of the site and its wider surroundings; and
- d in the case of an extension to an existing building or site, or a new buildings, it is of a size that is not disproportionate to the existing building, ~~(or buildings) or site~~. Any extension of building(s) or site should be designed to be in character with the existing building (or buildings) and ~~any new building~~ should not detract from the character of the area ~~existing building (or buildings)~~; and
- e where redevelopment is proposed, a specific need for the scheme has been identified, the scheme deals comprehensively with the site as a whole, and a significant environmental benefit will be achieved.