

Matter 2 (Ref: 498035)

**CHRISTCHURCH & EAST DORSET CORE STRATEGY
HEARING STATEMENT FOR MATTER 2**

ON BEHALF OF:

STOURBANK NURSERIES LTD

PREPARED BY:

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Submission Version

This document provides our Hearing Statement for Matter 2. 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).

We now outline our concerns in relation to the approach EDDC has taken to the review of the Green Belt, what this means for the overall strategy set out in the CS, and how our concerns can be remedied (based on the evidence we supplied in our *Compelling Case* document, May 2012).

The Green Belt (KS2)

No local Green Belt Review has been undertaken such that local landscape and visual impact issues have not been adequately assessed. This would inform the choice of sites and, in particular, *objectively* address: the need to fix long term defensible

boundaries (at the local level); effects on narrow Green Belt gaps such as the Longham-Ferndown Gap (Coppins Nursery, para 10.29 of the CS); and the consequences of losing the forest facing on to the A31 or impact on SSSIs at Blunt's Farm (para 10.42 of the CS). Without a plan-wide Green Belt Review or, so far as East Dorset is concerned, a Character Assessment similar to the work undertaken by Macgregor Smith in 2003 for Christchurch (Background Paper 11, para 2.13), there is no evidence for EDDC to make judgements on an objective basis between the allocated sites and non-preferred options such as Stourbank Park. We are aware of East Dorset's Landscape Character Assessment (2008), which is not on the EIP website, but this is markedly different from the Christchurch Character Assessment which, at paragraph 1.1.1 provides a study brief covering sense of place, environmental quality and capacity for development: in short, a sound basis on which to commence a selective Green Belt Review. The East Dorset work is descriptive (not analytical – there are no conclusions) and apparently not focused on Green Belt issues (eg the policy framework on page 3 does not include PPS2). These are very serious procedural and substantive failings.

From a positive point of view, however, 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. This view is underscored by the fact set out in our June 2012 representations that the glasshouses comprise previously developed land.

In short, we remain deeply troubled by EDDC's reliance on the strategic work undertaken as part of the RSS. Much of this is now out of date or inadequate and, in any event, paragraph 83 of the NPPF makes it clear that the preparation or review of the Local Plan is the place to address the ‘exceptional circumstances’ test – this is a more detailed and localised assessment than the strategic exercise. The decision in *University of Bristol and North Somerset Council* (February 2013) illustrates the interplay between the local and strategic, for example from para 122 onwards: **address the need first (eg in the ELRs), undertake the Green Belt Review, then allocate sites based on clearly stated ‘exceptional circumstances’**. This is the sound way forward.

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 is therefore difficult to rely on any employment-based ‘exceptional circumstances’ to support the release of Blunt’s Farm for development. 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**.

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. We hope our modification(s) can now be agreed expeditiously by means of a Statement of Common Ground.

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.

1732 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