

Purbeck District Council: Core Strategy Examination in Public Submission on behalf of ZBV (Winfrith) Ltd

Reference: 4953

- 1.1 ZBV (Winfrith) limited is an existing, significant landowner and investor in Purbeck District, with an extensive history in supporting the future for Dorset Green Technology Park, Wool (DGTP). ZBV (Winfrith) Ltd has made a number of representations to Purbeck District Council with regard to the objectives and policies contained in the LDF Core Strategy, Submission Draft.

MATTER 6: EMPLOYMENT (POLICIES ELS AND E)

6.1: Does the Core Strategy provide sound guidance for economic growth in the District relative to its needs? Is policy ELS sufficiently detailed and clear? NPPF (paragraph 21) advises that a clear economic vision and strategy for the area should be set out which positively and proactively encourages sustainable economic growth. Where is that strategy?

Economic Growth Strategy and Guidance

- 1.2 ZBV consider that the Vision for Purbeck and Spatial Objective 8 together do not form a cohesive or compelling economic vision and strategy. This is compounded by policies ELS and E which fail to set out any proactive or positive measures to support existing business, identify the strategic employment sites and sectors, or demonstrate how or where new inward investment will be accommodated.
- 1.3 Policies ELS and E and the reasoned justification text represents a simplistic analysis of the economy, broad job requirements drawn from the Workspace Strategy and the South West RSS and a brief description of the existing employment sites. There is nowhere to be found in policy ELS any detail that confers a measure of certainty over the economic/business sectors, skills or types and mix of floorspace that will be required for B Class employment.

Policy E which is purported to deal with new employment provision also fails in this respect.

- 1.4 While policy ELS identifies a future requirement for 11.5 Ha of additional employment floorspace, all reference to its focus or location is left to policy E and when referring to this latter policy it is clear that the locational detail has been removed since the earlier version of the Submission Draft Core Strategy. Instead, policy E simply states that new employment development will be focused at the most sustainable locations in accordance with Policy LD and at existing employment sites that do not fit in the settlement hierarchy such as Holton Heath (ZBV note there is no reference to Dorset Green Technology Park made in that policy).
- 1.5 ZBV are concerned that this policy position fails to reflect the importance of the DGTP and Holton Heath sites. Together these two sites provide approximately 120 hectares of employment land (equivalent to 83% of the District's employment land supply). It is anticipated that both sites will be needed to accommodate new employment growth for the District. The NPPF (as the former PPS4 also did) makes it clear at paragraph 21 that Local Plans should plan positively for the location, promotion and expansion of clusters or networks of knowledge driven or high technology industries, as well as seek to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use.
- 1.6 With all reference to potential sites to accommodate new growth deleted from Policy E, the Council is instead proposing to undertake a further Employment Land Review Stage 3 (at a later date) to assess options to accommodate growth and allocate sites within a "subsequent plan(s)". It is not clear the extent to which the employment implications of policy LD or of the proposed settlement extensions and District housing growth have been examined in preparing the Core Strategy.
- 1.7 Even if the NPPF had not yet been published (as was the position at the time of the Core Strategy's preparation) ZBV are of the view that the Core Strategy fails to meet the requirements of paragraph 4.1 of the former PPS12, which

made it clear that every local planning authority should produce a Core Strategy which includes strategic objectives for the area focussing on the key issues to be addressed; and a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram.

- 1.8 The failure to provide adequate guidance or a strategy for economic growth in the Core Strategy indicates that the Council has abdicated or simply ignored its responsibility to prepare positive, proactive employment policies.

Evidence Base

- 1.9 ZBV is further concerned that the evidence base underpinning policies ELS and E represents a partially completed exercise with the 2008 Workspace Strategy setting the sub-regional position at that time across Bournemouth, Dorset and Poole, but the Core Strategy makes no reference to the work of the Local Enterprise Partnership, nor of the Local Economic Assessment both of which are pivotal to the future economic strategy of the District now. Furthermore, the Council has yet to prepare and publish the Employment Land Review Stage 3 as the Core Strategy itself notes, which would provide additional, welcome, detail with respect to the future portfolio of employment sites. This information would have been valuable in assisting the Council to prepare the Core Strategy and particularly in the formulation of a coherent and complete employment land policy if it had been available.
- 1.10 In summary, ZBV's opinion is that policies E and ELS are unsound by way of evidential omissions and lack of adequate direction, detail and clarity over their ability to be delivered. They not only demonstrably fail to meet many of the economic development requirements of the NPPF at paragraphs 16, 17 (third bullet), 20, 21 (1st and 2nd bullets) and 37, but also create uncertainty in terms of the Plan's effectiveness and justification for the distribution of growth proposed in policies LD and HS.

6.2: What opportunities for additional employment provision have been assessed at Bere Regis, Wareham and Swanage. Why is the allocation of up to 1.2ha at Prospect Business Park not identified on Inset Map 11? Why have no other specific employment allocations been proposed? Why is the Dorset Green Technology Park not referred to in policy ELS?

- 1.11 ZBV address here the question of why Dorset Green Technology Park (DGTP) is omitted from policy ELS of the Core Strategy.
- 1.12 The National Planning Policy Framework (NPPF) encourages local planning authorities to proactively secure economic growth at paragraph 18 and identify strategic sites for local and inward investment to match anticipated requirements over the plan period at paragraph 21. It also requires local authorities to support existing business sectors and to identify and plan for new or emerging sectors to locate in their area. As ZBV noted previously, the Core Strategy policies ELS and E are unsound in relation to meeting the requirements of the NPPF through its omission of the DGTP site.
- 1.13 ZBV believe that the DGTP's prominent position as the single largest employment site within the District and its recognition through employment documents such as the Workspace Strategy wholly merits its inclusion in policy ELS and further reference in policy E.
- 1.14 Dorset Green Technology Park provides approximately 72 hectares of employment land (some to 50% of the Purbeck's total employment land supply). As noted in ZBV's earlier representations to the Core Strategy and within the SWRDA Workspace Strategy (2008), it is anticipated that the DGTP site will accommodate a significant proportion of future employment growth for the Purbeck area (with the Workspace Strategy identifying the opportunity to provide 20 Ha of new employment development, with 5 Ha made available for local demand and 15 ha for inward investment).
- 1.15 It is clear therefore that the Council's employment land portfolio will be dependent upon DGTP and Holton Heath to deliver the majority of the required employment land during the plan period. All other identified

employment sites are small-scale, include only minimal additional capacity to accommodate growth and fail to provide a suitable choice and mix of locations for occupiers.

- 1.16 However, both DGTP and Holton Heath are identified as falling outside the settlement hierarchy in Policy LD and hence are not considered preferred locations for new development. ZBV note that policy LD indicates that existing employment sites will be considered as exceptions to the typical presumption against development in the countryside, but there is no clear approach or guidance set out within the Core Strategy as to how new development at these exception sites will be assessed.
- 1.17 On this basis, DGTP is critical, in ZBV's view, to meeting the Core Strategy Vision for Purbeck and Spatial Objective 8. Given the importance of the DGTP site in contributing to meeting and accommodating forecast economic growth, it is ZBV's view that the Site must be clearly identified within policy ELS and policy E as an existing location for employment development with potential for future growth as a part of a wider mix of uses including residential to constitute a sustainable development that supports the District's stated ambition to increase self-containment and address issues of out-commuting.

6.3: Is there sufficient clarity regarding the infrastructure required to enable economic growth?

- 1.18 The evidence base regarding the infrastructure required to enable economic growth is contained in the Core Strategy Background Paper Volume 9: Purbeck Infrastructure Plan (2010 and updated August 2011). The background document is linked to the Core Strategy through paragraph 9.6 in the Implementation and Monitoring section. This notes that the Council will work with service providers to update the Purbeck infrastructure Plan.
- 1.19 In the Purbeck Infrastructure Plan, the document indicates at paragraph 1.4 that "due to the complexity of infrastructure delivery and changing political and economic conditions, in the majority of cases it is not possible to give a comprehensive overview of how infrastructure will be delivered over the

period of the Core Strategy up to 2026/2027". The paragraph continues by noting that it may be necessary to update this document in the future and that it will remain a live schedule.

- 1.20 ZBV understand the changing nature of infrastructure requirements over time and therefore the need for the Infrastructure Plan to remain a 'live' document. However, it is not appropriate for the Infrastructure Plan to exclude critical information on the long term infrastructure needs to deliver economic growth. The reasoning for this is the likely extensive lead in and delivery times for the provision of new transport and communication infrastructure as well as the implementation of skills, training and business support mechanisms that are necessary.
- 1.21 Aside from the Purbeck Infrastructure Plan, the Core Strategy makes reference to transport infrastructure evidence and strategy through the Purbeck Transportation Strategy (PTS) (2004 and updated in 2010) which is identified in policy ATS as a "flexible strategy to meet changing scenarios"; and through LTP3 (2011). Policy ATS then establishes that "detailed proposals for key transport infrastructure identified in the PTS will be provided through a subsequent plan(s)". This, in ZBV's view represents a lack of clarity in what and how key transport improvements will be secured to support economic growth.
- 1.22 The Core Strategy makes further reference to transport infrastructure through the Interim Transport Contributions policy. Policy DEV then sets out, very briefly, the need to make contributions to affordable housing, transport and heathland mitigation until replaced by CIL.
- 1.23 References to the desirability of improving broadband ICT communications are made through the text in support of policy E, although it is not set out in the policy itself, and is not linked back to evidence in the Purbeck Infrastructure Plan (section 12.4 and Appendix 4) which then does not contain any specific information on broadband investment beyond duties under the Telecommunications Act.

- 1.24 What becomes wholly apparent when reading across the disparate evidence base on infrastructure is that the Core Strategy Vision, Spatial Objectives and policies ELS and E do not adequately detail or cross refer and link to the Infrastructure Plan or the Purbeck Transportation Strategy in a clear and coherent manner. The sub-area policies make some references to the PTS but again this is not systematically set out, or indeed drafted with any certainty that the infrastructure would be delivered.
- 1.25 No substantive evidence is provided of how business support, communications of transport infrastructure will be delivered to attract and support key sectors, and investors/occupiers for the knowledge industries (or indeed other sectors).
- 1.26 There is therefore, in ZBV's view, little evidence presented in the Core Strategy itself that indicates how the infrastructure needs identified for economic growth are to be delivered.

6.4: Policy ELS refers to existing employment sites being carried forward on the Proposals Map. Where are these sites and what policy would apply to them?

- 1.27 ZBV do not wish to make any comment with respect to this issue other than to note that the Proposals Map and policy ELS should be wholly in alignment with each other to the benefit of clarity and transparency.

Matter 6 Conclusions

1.28 With respect to Matter 6, ZBV conclude that Core Strategy policies ELS and E are unsound as they are not:

- **Positively prepared**, the Plan fails to set out an economic vision that identifies and meets the future economic needs of the District. Reference to the evidence base is not sufficient to meet the requirements of the NPPF at *inter alia* paragraphs 16, 20, 21 and 156. It is wholly reasonable to expect the Core Strategy to provide this positive and proactive economic strategy both for existing businesses and sites but also to give weight and clarity with respect to future inward investment and how the Council propose to balance homes and jobs in the District;
- **Consistent with national policy** in the NPPF – particularly paragraphs 16, 20, 21 and 156;
- **Effective** in demonstrating how the supply of employment land will be protected and how new employment floorspace and therefore jobs will be used to support identified economic sectors and therefore deliver Spatial Objective 8. Furthermore, it is ineffective in establishing the balance to be secured between new homes and jobs to meet the District's identified needs and those of neighbouring areas in accordance with the Duty to Cooperate;
- **Justified** in failing to plan for the most appropriate economic and employment land strategy based on the available, objective evidence of existing sites that contribute to the economy such as Dorset Green Technology Park and which can contribute further in the plan period given the appropriate policy support to do so as part of a wider mix of sustainable land uses.

1.29 ZBV consider it is unacceptable for Purbeck District Council to fail to plan positively for the delivery of employment land and to leave the critical details that would be provided by a comprehensive Economic Strategy and Employment Land Review to a subsequent stage of work. The Core Strategy

requires a clear, unambiguous statement of the level of employment floorspace based on a current and future economic proposition that draws in the Bournemouth Dorset and Poole LEP strategy. In order to do this, the Plan needs to set out the job creation targets, the key existing and growth sectors and how the portfolio of employment land will secure and deliver this. This should be allied to a current and realistic infrastructure needs strategy that identifies the necessary investments in infrastructure to aid the economy and how these will be funded. This would ensure that there is a clear, positive linkage between the implementation of policies ELS and E, with policies LD, HS, CO, the sub-area policies and the Key Diagram and Proposals Map. ZBV believe that in order to achieve this and thereby ensure a sound Plan, it will be necessary to re-test and assess the employment evidence base and undertake substantive policy and text re-drafting which would require further public consultation.