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Your Ref:
Our Ref: **360378**

23 August 2013

Dear Ms Neal,

CHRISTCHURCH AND EAST DORSET CORE STRATEGY EXAMINATION

HEARING STATEMENT ON BEHALF OF THE MALMESBURY ESTATE

DTZ have been instructed by the Malmesbury Estate to submit statements of representation in response to the *Matters and Issues 6: Bournemouth Airport (BA1, BA2, BA3)* to be considered at the Examination in Public on Wednesday 18th September 2013.

We have responded to issues 1, 3, 4 and 5. We have not responded to issues 2 and 4.

I trust that the enclosed statements are accordance with the *Examination Guidance Notes*.

Please do not hesitate to contact me should you wish to discuss.

Yours sincerely,

Natalie Essa (BSc (Hons))
on behalf of Peter Weatherhead MRTPI
Consultant, Development Consulting, DTZ

CHRISTCHURCH AND EAST DORSET CORE STRATEGY EXAMINATION SEPTEMBER 2013

HEARING STATEMENT ON BEHALF OF THE MALMESBURY ESTATE

MATTERS AND ISSUES 6- BOURNEMOUTH AIRPORT (BA1, BA2, BA3)

1. Are the changes to the Green Belt boundaries at Bournemouth Airport justified?

The Estate contends that the changes to the Green Belt boundaries at Bournemouth Airport are neither justified nor effective, as the new boundary fails to represent the most appropriate strategy, against other reasonable alternatives. In particular, it fails to capitalise upon the potential of the Malmesbury Estate land to provide airport related and employment development in a sustainable location and thus fails to provide green belt boundaries that are permanent in the long term and are capable of enduring beyond the plan period (NPPF, para.83).

The Malmesbury Estate supports the Core Strategy (“CS”) case that there are exceptional circumstances for amendment to the Green Belt boundary in the vicinity of Bournemouth Airport. However, given the importance of the Airport as a broad location for employment and airport-related development, the boundary needs to be realistic, so that it is sustainable and appropriate for long term planning and development.

The Estate supports the removal from the Green Belt of that part of its land outside the Airport boundary and opposite the terminal buildings that is currently used as the Airport car park. This land, with its lighting and security masts and large areas of hard surfacing, clearly does not fulfil any Green Belt functions or purposes. It opposes the proposed zoning restriction relating to this land. The Estate contends that the remainder of its land in this strategic location should be similarly released for development without restriction. In order for the CS to be justified, it should include a wider area than either the land owned by the Airport, or needed for its operational development.

The proximity and accessibility of the Malmesbury Estate land, being directly adjacent to the airport, provides the most suitable land to provide employment and other airport related development. It should therefore be excluded from the Green Belt to allow the CS to capitalise on the Airport’s key function as a major growth point for employment development. This strategic role has long been established in planning policy and this was reaffirmed as recently as June 2011 by the Dorset Local Enterprise Partnership. One of the LEP’s priority actions is “creating a global hub for trade and international business – focussing particularly on opportunities linked to Bournemouth Airport, Port of Poole and Portland Port (potentially focused initially on the development of a proposal for an “archipelago” Enterprise Zone, or using available powers to achieve the outcome”.

In order to achieve the strategic vision a flexible approach is required by making the Airport a broad location for development and ensuring that sufficient land is available to capitalise upon the potential for

employment and a sustainable public transport interchange. The employment land within the Airport business parks requires substantial infrastructure investment to enable its delivery; in particular the eastern business park requires a new access to the A338. There has been considerable uncertainty for many years over the feasibility and deliverability of this access road, due to the extensive cost, and the sensitive nature conservation designations which lie within and adjoin the site. The Employment Land Review confirms that there is “very little land at the Airport which is immediately available for development without significant delay thus creating serious issues for land supply” (para 7.1). The document adds that the Airport accommodates a significant amount of the sub-region’s employment needs; this significance is even greater as other strategic sites such as Blunts Farm (Ferndown) are uncertain to come forward (para 7.2) Due to this uncertainty and the lack of clearly defined timescales for infrastructure delivery, it is questionable as to whether the CS is ‘effective’.

The Malmesbury Estate provides suitable flexibility to accommodate airport related and employment development as well as any park and ride/transport interchange facility. The Estate can also provide much of the land required for the necessary strategic transport infrastructure improvements thereby reducing the cost and improving the deliverability of these improvements. The Core Strategy should therefore release the Malmesbury Estate land from the Green Belt.

The Estate strongly objects to the proposed zoning under policy BA3, which limits the designated use of the car park land as open air car parking. This is not consistent with the NPPF, in that it does not promote flexibility for future uses. Indeed, paragraph 19 of the NPPF advises that planning should operate to encourage and not act as an impediment to sustainable growth and that significant weight should be placed on the need to support economic growth through the planning system. Paragraph 21 adds that policies should be flexible enough to accommodate needs not identified in the plan and to allow a rapid response to changes in economic circumstances.

This is an important point as the Core Strategy determines the long term planning policy for the area over the next 15 years, and opportunities to revise policy may not arise again soon. It is therefore important to make provision for a range of sustainable airport uses to allow for future flexibility.

3. Should policies take the opportunity to provide for employment development opposite the terminal buildings?

The Malmesbury Estate considers that the policies should take into account the opportunity to provide employment development land opposite the terminal buildings, as this is the most suitable location for these uses.

The Malmesbury Estate agrees with the comment that a strategic employment area like Bournemouth Airport has the potential to attract significant investment. The Airport should be categorised as a broad location for employment development, thus introducing flexibility in land supply. This would be consistent with paragraph 83 of the NPPF which states that Local Plans and any amendments to the Green Belt boundaries should be capable of providing a long- term strategy, beyond the plan period.

There are said to be 30ha of available land in the Airport’s Northern business parks but development has been constrained by the sensitive nature conservation designations which lie within and adjoin the site. The link road to the A338 has been proposed for many years but has never been delivered due to economic and environmental limitations.

This Malmesbury land is a more sustainable location for Airport related employment development and these representations seek the land's removal from the Green Belt to accommodate this. The current car park use on the Estate is part of the proposed allocation. The land's proximity to the terminal buildings makes it an eminently suitable site for hotel development, car parking, transport interchange/park & ride for visitors to Bournemouth (which is being promoted in the South East Dorset Local Transport Plan, 2011), employment uses, petrol station and A3, A4 and A5 uses

The Malmesbury Estate accepts the Airport's growth and the need for associated facilities including hotel development, landside retail and catering facilities, car rental services, training centres for airlines and related services, petrol filling stations and maintenance facilities. However, the Estate objects to the suggestion that these facilities should be provided in the Airport or its business parks. The land within the Malmesbury Estate is well located to accommodate these uses due to its strategic location next to the airport and immediately east of the airport access road, main terminal building and car park.

The Council's reasons for rejecting the Estate's representations were that Manchester Airport Group (MAG) had not identified a requirement for the Estate's land to meet the operational needs of the Airport and that the Estate had not come forward jointly with MAG with a joint proposal. The Council further stated that there was sufficient employment land in the Airport business parks. There is a clear implication that if MAG had supported the Estate's proposal then the Council would have reacted positively and seen this as justification for removing the land from the Green Belt to support the Airport. MAG is a developer with a vested interest in promoting the development potential of its own land rather than an arbiter in the proper planning of the area. This suggests that the Core Strategy proposals were not positively prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements of the area, including the unmet requirements from neighbouring authorities (NPPF, para. 182).

4. Are the strategic transport improvements required to support the vision and allocation (identified in KS10) funded and deliverable?

The Estate believes that adequate funding is not yet identified and confirmed and that there are significant questions regarding the deliverability of the majority of the Strategic Transport Improvements identified in Policy KS10. The policy identifies those improvements in three tranches. The short term measures (2013-2017) are for improvements to the B3073 Hurn roundabout and for the reconstruction and widening to three lanes of the A338 between the Blackwater and Cooper Dean interchanges.

The Estate is aware that funding towards the Hurn roundabout improvement is available from Section 106 Agreements related to the Airport terminal improvements and the planning permission for development at Aviation Business Park West. It is understood that this funding does not cover the total cost of the roundabout improvements, but Dorset County Council is currently promoting an improvement scheme, presumably on the basis of using its own funding toward the shortfall. The roundabout scheme is said to offer capacity for the Airport improvements and the outline planning permission for 42,000m² of employment floor space development at Aviation Business Park West (together with housing at Parley Cross). Analysis shows that the proposed improvement is not adequate to cater for that scale of development and has insufficient capacity. Nor did that analysis take account of the allocated waste plant site at Aviation Park West. Further improvements will therefore be required in future, or current proposals will need to be upgraded – subsequent development of the remainder of the identified 30

hectares of land will clearly require much more substantial improvement. Both of those options raise questions regarding the funding.

Most of the additional land required for the current scheme is owned by the Estate. The Estate may be willing to make land available for a suitable improvement which provides adequate capacity for potential future developments in the vicinity of the Airport, including on its own land adjacent to the terminal buildings. However, it is reluctant to do so for an inadequate scheme. These concerns, coupled with potential funding shortfalls, raise significant doubts as to deliverability.

As far as the Estate is aware, no funding has yet been allocated for the A338 reconstruction and widening between Blackwater and Cooper Dean. It is understood that Dorset County Council is working on the business case for funding, in the hope of securing funding from the Government's City Deal funding stream, but this is a relatively high cost scheme. Much of that length of the road is elevated where it crosses the flood plain and there are a number of structures involved. The Estate owns land abutting the western side of the road and it is likely that acquisition of some of this land will be required. Given the high cost of the proposals and the current lack of secured funding, together with the need to acquire land, deliverability cannot be assured.

The medium term works set out in policy KS10 (for the period 2018-2022) include improvements to the Blackwater interchange. It is understood that relatively minor funding is available towards small scale improvements here from the Airport Section 106 Agreements but other funding towards strategic improvements of the interchange has not yet been secured. The identified works also include improvements to the Chapel Gate roundabout and at Parley Cross.

The longer term proposals (2023-2028) incorporate widening of B3073 from the Chapel Gate roundabout through to Blackwater interchange. This will have significant costs and will require land along the whole length of the route. The Estate owns land adjacent to that route over much of its length, and for a significant distance it owns land on both sides of the existing road. The Estate is not aware that any improvement scheme has yet been worked up and no specific funding has been identified, let alone allocated. There are, therefore, significant questions relating to both funding and deliverability of those works.

The Council has recently suggested that the strategic Transport Hub/park and ride facility will simply comprise two to three high quality bus shelter and some real time information screens. That is simply not consistent with the strategy set out in the LTP.

The Estate is generally supportive of the Core Strategy case for Airport and employment related development in the vicinity of the Airport and would wish to be a willing partner in helping to facilitate the associated and necessary infrastructure improvements. However, in the absence of any recognition of its own proposals for development in that area there is little incentive for the Estate to do so.

5. Is the land allocated within the Core Strategy at Bournemouth Airport sufficient to facilitate the provision of the “transport hub” as set out in the Local Transport Plan?

The Core Strategy does not allocate sufficient land to provide a transport hub as set out in the Local Transport Plan 3 and is therefore inconsistent with its evidence base. Indeed, the Core Strategy fails to address the issue.

The Local Transport Plan policy LTP H-4 states that strategic park and ride capacity will be developed at appropriate locations, where adequate demand exists, to assist sustainable transport movement to and from town centres. The supporting text adds that proposed locations for bus based park and ride facilities have been identified as shown in Table 9.2. This table lists Bournemouth Airport Interchange/Transport Hub as a strategic bus based park and ride facility to be delivered in the medium term, which is said to be 2014-2020.

The Core Strategy does not make any provision for the proposed ‘Transport Hub’. The Core Strategy should recognise the importance of providing a sustainable transport solution and address the requirement identified in the LTP.

The Estate supports the Local Transport Plan 3 proposals for an Airport ‘Transport Hub’. It contends that its land adjacent to the existing car park can readily accommodate this facility alongside employment and airport related development. Indeed, the Estate argues that its land is better placed to accommodate the Transport Hub facility than other land within the Airport its Business Parks because of its proximity to the terminal buildings. For a transport interchange to be successful it needs to offer quick and convenient transfers between modes for all passengers. It must therefore be immediately accessible to all passengers without a need for intermediate transfers. The Estate’s land meets that criteria and would build upon the parking facilities already provided on Estate land and enhance infrastructure provision in the area. The LTP identifies the provision of a transport interchange hub at Bournemouth Airport as a Priority Action to be brought forward in the second part of the (LTP) Implementation Plan, which covers the period 2014-2020. The need to identify a site and land for the hub is therefore pressing. This is a further reason why the Estate’s land should be removed from the Green Belt.

REPENTOR NUMBER: 360378

APPENDIX 1- Photographs of the Malmesbury Estate land used as Airport car parking with lighting security masts and hard surfacing.

