

**Matter 12 (Ref: 498035)**

**CHRISTCHURCH & EAST DORSET CORE STRATEGY  
HEARING STATEMENT FOR MATTER 12**

**ON BEHALF OF:**

**STOURBANK NURSERIES LTD**

**PREPARED BY:**

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**Submission Version**

This document provides our Hearing Statement for Matter 12. It needs to be read in conjunction with our other Hearing Statements.

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 which, in our opinion, will cause implementation difficulties and a lack of delivery on the key objectives of the Core Strategy ("CS").
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 request that the Inspector modifies the CS to provide for employment development at Stourbank Park. The evidence to do this (on Green Belt and employment grounds) is set out in *Stourbank Park, Wimborne: A Compelling Case* (May 2010).

In terms of the implementation difficulties associate with the CS, 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. 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?

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.**

## Conclusion

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.

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.

**1263 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](http://www.bloombridge.com)