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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 1: Overall Strategy* to be considered at the Examination in Public on Tuesday 10th September 2013.

I trust that the enclosed statement is in 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

REPRESENTOR NUMBER: 360378

CHRISTCHURCH AND EAST DORSET CORE STRATEGY EXAMINATION SEPTEMBER 2013

HEARING STATEMENT ON BEHALF OF THE MALMESBURY ESTATE

MATTERS AND ISSUES 1- OVERALL STRATEGY RELATING TO EMPLOYMENT LAND

The Malmesbury Estate wishes to comment on the proposed quantum of employment land (Policy KS5) and whether it is justified by the evidence (Issue 6). The Estate considers that the justification is tenuous and that a flexible approach to employment land allocation is required to support economic development and capitalise on the potential of strategic key sites such as Bournemouth Airport.

Policy KS5 seeks to identify 80ha of new employment land, 60ha (71%) of which is located on two sites – Blunts Farm and Bournemouth Airport Aviation Parks. This provision is based on the Bournemouth, Dorset and Poole Workspace Study (2012) which is said to identify a requirement for 173ha of employment land for B1, B2 and B8 uses across the Bournemouth and Poole housing market area between 2011-2031 (para 4.26).

The Core Strategy does not explain how this requirement is translated into the site allocations shown on Map 4. or the 80ha set out in policy KS5. The Core Strategy states that it is important for the economies of the districts and wider sub-region for sufficient employment land to come forward in Christchurch and East Dorset. It refers to sites of strategic importance such as Bournemouth Airport Northern Business Park and Ferndown Industrial Estate. It also notes that employment land requirements cannot be met on brownfield sites alone and that the future economic requirements of Christchurch and East Dorset and the wider sub-region provide exceptional circumstances for changes to green belt boundaries. The Malmesbury Estate endorses this and contends that this logic also applies to its land adjacent to Bournemouth Airport, which it feels is located in a more sustainable location than alternative sites as the land is directly opposite the Airport terminal.

The Bournemouth, Poole and Dorset Workspace Study (2012) examines three scenarios, assessing demand and supply with no flexibility, 10% flexibility and 20% flexibility. The Core Strategy, without explanation, chooses the mid-range employment land requirement of 173ha. The Study has a requirement ranging between 160 and 186ha depending on the three scenarios and predicts a shortfall in the Bournemouth and Poole SSCT area. Clearly an analysis based on the Bournemouth and Poole SSCT cannot take account of the needs of the wider sub-region which were set out in the Pre-Submission version of the Core Strategy where the requirement was stated to be 248ha.

The Core Strategy acknowledges that in order to bring forward significant further employment land, off site transport infrastructure works are required which are set out in policy KS10.

This is examined further in the Employment Land Review (ELR) which states that “there is a real shortage of employment land in the Borough to meet demand” (para 6.9). The Review states that there is “very little land at the Airport which is immediately available for development without (close gap) 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; our emphasis).

The ELR refers to the need for access improvements to the Airport business parks, including a new link road to the A338 which is subject to “significant environmental constraints as any prospective highway alignment would cut through SSSI” (para 7.12). The “significant infrastructure constraints” and the necessity for funding commitment to bring the whole site forward are said to require further investigation (para 6.4). In meetings held with the Council, planning officers acknowledged that the A338 link road is unrealistic given the environmental constraints and prohibitive price tag. It is for this reason that the Council has not included the link road in the Core Strategy proposals.

The Eastern Aviation Park has very poor access along a narrow, partly single carriageway, road and the ELR comments that this poses issues for the types of employment that can be attracted to locate there.

The Western Aviation Park’s development prospects are also hampered by the County Council’s proposed Mechanical Biological Treatment plant using Refuse Derived Fuel which is set out in the Dorset, Bournemouth and Poole Waste Local Plan, adopted in 2006 Manchester Airport Group (MAG) argued at the examination into the Waste Plan that this plant would act as a disincentive to potential employment development and investment. It is to occupy a site of 5.6ha at the western end of the Aviation Park and requires a new link road to Chapel Gate to accommodate the anticipated traffic of 190 HGVs per day and 50 cars per day. Despite evidence on the deterrent effect that this would be likely to have on employment development the inspector supported the proposed Waste Plan. An extract from the adopted plan relating to the site forms Appendix 1.

All of these factors point to the need for a flexible approach to the provision of employment land which maximises the potential of strategic employment areas which are readily accessible such as the Malmesbury Estate land at Bournemouth Airport. However, the Council’s reasons for rejecting the Estate’s representations were that MAG had not identified a requirement for the Estate’s land to meet the operational requirements 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 its own land’s development potential. This also 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

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the area, including the unmet requirements from neighbouring authorities (NPPF para 182). As explained in this statement, the quantum of employment land allocated is also not sufficiently justified. This makes the plan unsound and modifications to the Strategy are required.

In order to make the Core Strategy sound we suggest that Bournemouth Airport is identified as a broad location for employment land and the Malmesbury Estate land is removed from the green belt as is proposed for that part of the Estate's land that is currently used for airport car parking.

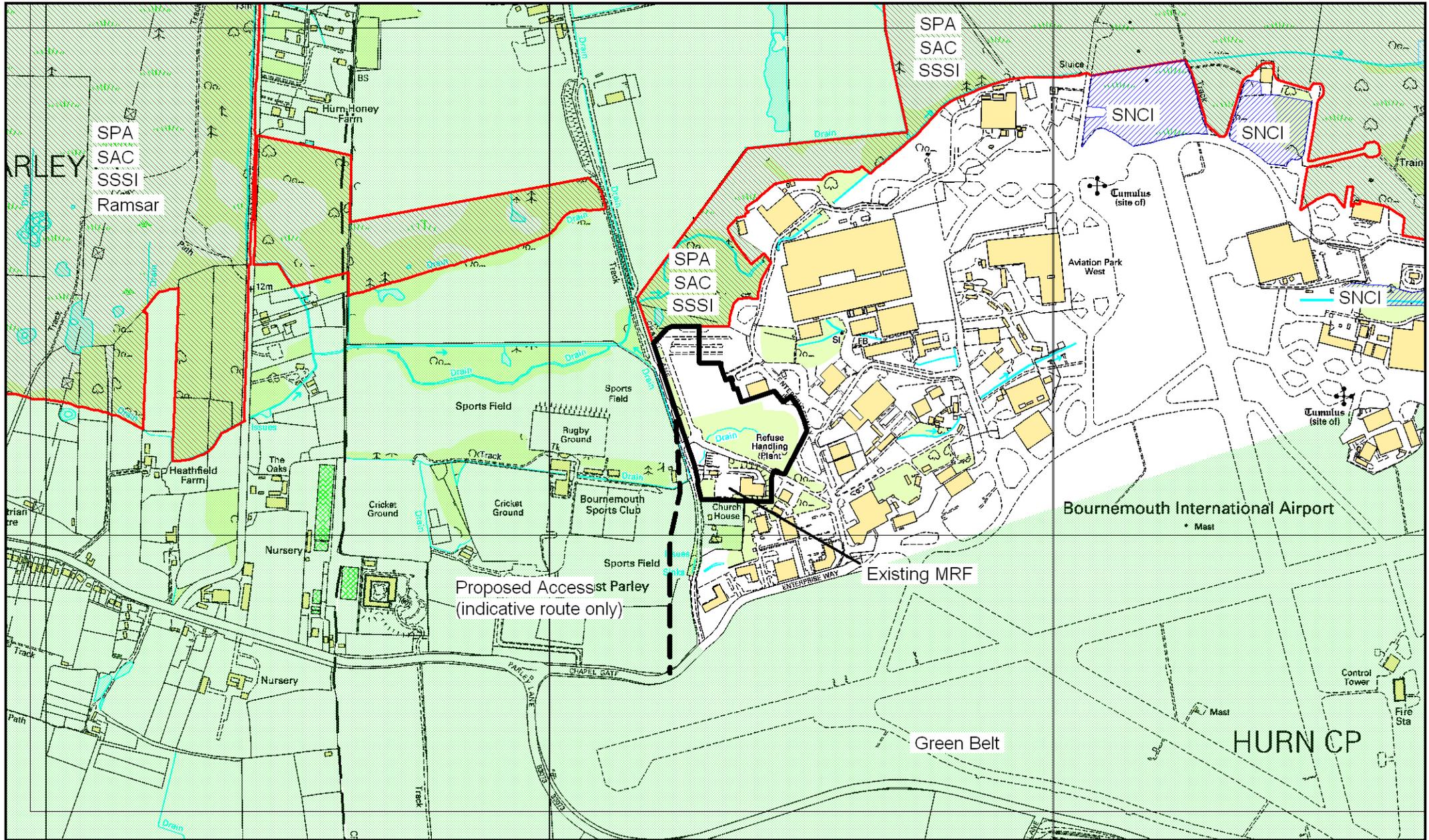
APPENDIX 1- Extract from the Waste Plan relating to Bournemouth Airport

Inset 4

**Land at Bournemouth Airport
(Christchurch Borough)**Grid Reference:
410370 098230

Description	This site lies at the western extremity of a large strategic employment and industrial allocation. It is partly derelict and lies within the NW Sector of the Airport (Aviation Park West). The Hurn MRF occupies the southern part of the site.
Proximity to waste arisings	Ferndown 3kms Bournemouth 4kms
Households within 16 km radius	222,600 households
Development plan and planning policy	This is a strategic employment site in the Bournemouth, Dorset and Poole Structure Plan 2000 and is allocated in the Christchurch Local Plan 2001 Policies EI 5 and EI 6 for industry and business uses. The airport master plan produced in July 2003 by consultants on behalf of the Manchester Airport Consortium suggests the area where the MBT is proposed should be allocated for office use.
Site area	5.62 hectares
Range of facilities being considered	Mechanical Biological Treatment (MBT) with Refuse Derived Fuel (RDF)
Land take required	A stand-alone MBT plant with RDF would require, depending on layout, between 2.9 and 3.6 hectares
Impact on residents	The nearest residential property is Church House, immediately to the south of the site and the Hurn MRF. Two more properties in Chapel Lane (Chapelgate House and Barnabas Lodge) are within 80m of the southern boundary.
Landscape/ Visual Assessment	The site is well screened from the west and north by trees and vegetation and from the south by the MRF. Additional screening may be necessary along the eastern boundary.
Constraints on the site and adjacent land	Hurn Common SSSI (part of Dorset Heath cSAC, and Dorset Heathlands SPA) abuts the site to the north. Hurn Airport SNCI lies 750m to the north west. The Parley Common SSSI (part of Dorset Heath cSAC, Dorset Heathlands SPA and Dorset Heathlands Ramsar site) is to the north west and 250m from the site at its closest point. European Protected Species are known within this area. Any new access road from Chapel Gate roundabout would need to cross Bournemouth Sports Club and Green Belt.
Traffic generation	190 HGV movements per day 50 car movements per day A traffic assessment would be required to support any planning application for development.
Access considerations	A new link road from Chapel Gate to the site, which would relieve the southern part of Chapel Lane of traffic from the site, the MRF and the composting site further north, may be required. If this is the case, alternative access arrangements will need to be provided for Bournemouth Sports Club

Inset 4 Bournemouth Airport



Bournemouth, Dorset and Poole Waste Local Plan

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Scale 1:10000

Site Grid Ref 410370 098230

