

Unsoundness objections to submitted Poole Core Strategy May 2008 by Savills

Summary

1. A regeneration strategy for Poole town centre and Hamworthy is a fundamental part of the Core Strategy which is understood and supported. However the focus on the regeneration strategy, and the desire to ensure that other development does not harm it, has led to
 - an inadequate employment land provision;
 - a failure to set such employment land provision within the sub-regional context;
 - and has failed to consider complimentary alternatives or provide reasonable flexibility to deal with unforeseen circumstances.

Analysis

2. The introduction to the submitted Core Strategy notes at paragraph 1.17 that Poole has been selected as a growth point. It thus has an important part to play in meeting wider regional and national aspirations for economic growth. Its role is integral in the SE Dorset sub-region and Poole has good potential for economic growth.
3. The introduction also notes in the consultation findings section of paragraph 1.21, that whilst there was some support for retaining the green belt, concern was expressed by the business community about the lack of readily available employment land with a need for some land in the green belt to be released for this purpose.
4. The introduction describing the sustainability appraisal at paragraph 1.23, notes that the focus on accommodating development within the urban area will have implications for prime transport corridors with a desire to increase the share of trips by public transport, walking and cycling. At paragraph 3.17 Poole's decline in manufacturing in common with the national trend is noted. However there is no recognition of the severe shortage of land for the expansion of existing firms which leads to the assumption that all employment land provision can be met in the town centre, the Hamworthy regeneration area, and on existing employment sites including the Sopers Lane and Fleets Corner sites.
5. Poole Council officers as part of the SE Dorset Strategic Planning Authority's technical team identified the need to allocate employment land to provide for job growth in the Bournemouth and Poole travel to work areas in 2005. Their technical evaluation led to the proposals for the allocation of 193 hectares of additional employment land including the Canford, Blunts Farm and Creekmoor new allocation proposals.
6. However the Joint SE Dorset Planning and Transportation Committee when it met on the 12 September 2005 rejected this recommendation and deleted the proposed Canford and Creekmoor sites in Poole Borough. This left the proposals at Bournemouth International Airport and 20 hectares of land proposed at Blunts Farm, Ferndown as the only new provision. In the SE Dorset conurbation these proposed employment allocations represented a third of the annual rate of development proposed in the 1994 – 2011 Structure Plan. Representations were made that this would exacerbate the existing shortages of employment land in the area and failed to achieve the best balance between the economic potential and environmental assets of the area.

7. Despite the higher rates of provision made in the 1994 – 2011 Structure Plan there is a continuing acknowledged shortage of available employment land. The RSS technical report SED07 in November 2005 on page 1 identifies this. The workplace strategy for SE Dorset prepared for Bournemouth, Dorset and Poole Economic Partnership and the South West Regional Development Agency in December 2003 explained the difficulties of bringing forward and developing available employment land and premises over the previous 15 years. The SE Dorset technical officers at paragraph 2.28 of SED07 quote the workplace strategy and agree that despite an apparently healthy employment land supply the true availability is anything but healthy.
8. A very substantial part of the submitted RSS employment land proposals was the 80 hectares of land proposed at Bournemouth International Airport. This was the only large strategic site proposed in the second largest economic area in the SW. There are major constraints associated with the development of the airport of both on and off-site. Paragraph 5.46 of SED07 stated that in the absence of Bournemouth International Airport employment site, the amount of allocated employment land available in the sub-region may not be sufficient to ensure an appropriate mix of sites.
9. For these reasons the Panel considering the submitted RSS reported to the Secretary of State that in view of the difficulties involved in implementing the link road to Bournemouth Airport (because of the need to allow for important environmental areas, potentially making the link road an uneconomic proposition), they took the view that employment development at the Airport could only be regarded as a longer term project in terms of public finance and investment (paragraph 4.7.27).
10. The Panel also noted that in the Bournemouth and Poole travel to work areas provision should be for about 42,000 jobs over the planned period with about 23,000 jobs at Bournemouth and about 19,000 jobs at Poole (proposed policy SR7.3). Once the Airport development which is fraught with infrastructure difficulties has been set aside as longer term, there is minimal additional land release proposed for employment development in the RSS.
11. At the RSS panel examination, SWRDA referred to the DTZ study and identified the significant shortfall of employment land in the conurbation. A market demand in Bournemouth for 67 hectares of employment had been identified compared to the capacity of around 12 hectares. In Poole the gap identified by the study was more pronounced with supply of 13 hectares and a demand of 85 hectares (Panel report 4.7.23). The Panel noted this implied a total deficiency of 127 hectares but refined this to about 104 hectares in view of the DTZ study taking account of past rates of development. At the Examination in Public the strategic authorities seemed to acknowledge a deficit of 110 hectares. The Panel were therefore of the opinion that the search for additional land to meet a target of 110 hectares should be conducted across the conurbation. They inserted a policy to this effect.
12. The Core Strategy's reworking of the need for 13,700 jobs over the same period is 5,300 less than the figure set out in the Panel's analysis leading to the requirement for an additional 110 hectares of employment land. This is stated to have been provided from detailed employment forecasting carried out by Roger Tym & Associates on behalf of the SW Regional Assembly based on the same growth rate in gva of 3.2% per annum as set out in the draft RSS, and the Dorset Workplace Review 2008 carried out by GVA Grimley..

13. At paragraph 6.2 the Core Strategy calculates employment land requirements based upon the Cambridge Econometrics model. This work appears to be contained in the Dorset Workplace Strategy Review commissioned by the Regional Development Agency, the final report of which was due to be published in May 2008. However the document has yet to be published. Setting aside the issue of how much weight can be placed on a critical unpublished evidence base for the moment, the Core Strategy indicates that only 39.5 hectares of employment land need to be provided over the plan period for B class use. This includes 14 hectares to take account of forecast losses between 2008 and 2026.
14. Poole had 18.7 hectares of available employment land allocated or with planning permission in April 2007 (mainly within Poole's existing employment areas). The Sopers Lane and Fleets corner proposed redevelopments plus the regeneration area town centre / Hamworthy proposals would provide 13.95 hectares requirement. The core strategy therefore proposes no additional employment land allocations. Paragraph 6.2 of the Core Strategy then goes on to note that further flexibility and choice in the sub-region would be provided by Bournemouth International Airport as a strategic employment site with potential to provide significant growth. Subsequently at paragraph 6.6 it is suggested that the employment development at Bournemouth International Airport could contribute in the region of 1,000 jobs to 'Poole's' requirement.

Non compliance with RSS

14. From this analysis it can be seen that no new sites are proposed for employment development in Poole, notwithstanding the acknowledged shortages which particularly arise from the need to accommodate existing firms' growth. The Panel recommendation in the emerging RSS process has been pre-empted by the submission of the Core Strategy. No attempt is made in the Core Strategy to relate the conurbation wide employment needs to the previous identification of unconstrained sustainable new proposals within Poole Borough as part of a wider economic employment strategy for the conurbation. The sustainability appraisal fails to consider these options. It is the RSS which the Poole Core Strategy should be seeking to implement. The Core Strategy must take full account of the RSS. It fails to respond to the Panel's recommendation and the closing date for representations is 10 days before the expected Secretary of State's decision on the Regional Spatial Plan.

Underprovision of employment land

15. There is a serious under provision of new employment land proposals which can harness Poole's contribution to the sub-region and region in terms of its good potential for economic growth. The sites at Canford and Creekmoor previously identified and proposed by the officers for inclusion in the Regional Spatial Strategy work have not been given proper consideration. The sustainability appraisal fails to properly consider the role that they could play in the Poole journey to work area, the SE Dorset conurbation and regionally. The reference on p.25 of the sustainability appraisal defers to other authorities.

A suitable opportunity for strategic employment

16. Savills acts on behalf of the principal landowners in respect of the 60 hectares of the employment park at Canford. The attached plans show the location of the proposal and its relationship to the wider conurbation. They also show the potential of the site. The site is well placed in transport terms to the whole of

the polymorphic structure of the SE Dorset conurbation. There is traffic capacity on the A341 and the existing junction can accommodate the development. There are no major infrastructure constraints.

17. Natural England supports the proposal as it is designed to assist in minimising access to Canford Heath SPA from the North. The corporate park-and-ride proposals provide the opportunity to move large numbers of workers to the site by dedicated bus proposals from the centres of Bournemouth and Poole as well as other focal points in the conurbation. Journeys to work from Poole and Bournemouth will be against the peak hour flows with existing highway network capacity. The returning vehicles will then be able to transport commuters to the town centres from an on site park-and-ride facility. This would assist the transport objectives of the strategy.
18. The proposals have particular advantages in promoting sustainable development and generation of energy on-site. In addition to the buildings meeting the BRE-AM 'excellent' ratings, and a full sustainable drainage system in accordance with PCS33, the waste to power station on the site will be able to uniquely provide the power needs of the development through a combined heating and power scheme. (A more detailed report on the proposal is available).

Soundness tests

17. In light of the previous analysis we submit that the employment strategy of the submitted Poole Core Strategy fails to meet the soundness tests in respect of four of the tests.

Test 4C

In seeking to pre-empt the Panel conclusions on the Regional Spatial Strategy recommendations to the Secretary of State in advance of the Secretary of State's decision including the proposed policy for 19,000 jobs in Poole and in not seeking to address the employment land shortages identified nor the search for 110 hectares of employment land in the conurbation the Core Strategy is not in general conformity with the emerging Regional Spatial Strategy.

Test 6

The Strategy is not consistent with the requirement on neighbouring authorities derived from the Regional Spatial Strategy in respect of its employment proposals and fails to take account properly of cross boundary issues.

Test 7

The Strategy for the economy and employment is not the most appropriate in all the circumstances and has not properly considered the relevant alternatives. It does not appear to be founded on a robust and credible evidence base, particularly in view of the non-publication of the GVA Grimley report.

Test 9

The Plan has no flexibility to enable it to deal with changing circumstances in relation to economic employment growth requirements. The reliance on the hope that longer term development at Bournemouth International Airport might provide that flexibility is an inadequate response to the potential continuing serious shortage of employment land in Poole and in the SE Dorset area.

Savills Planning
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