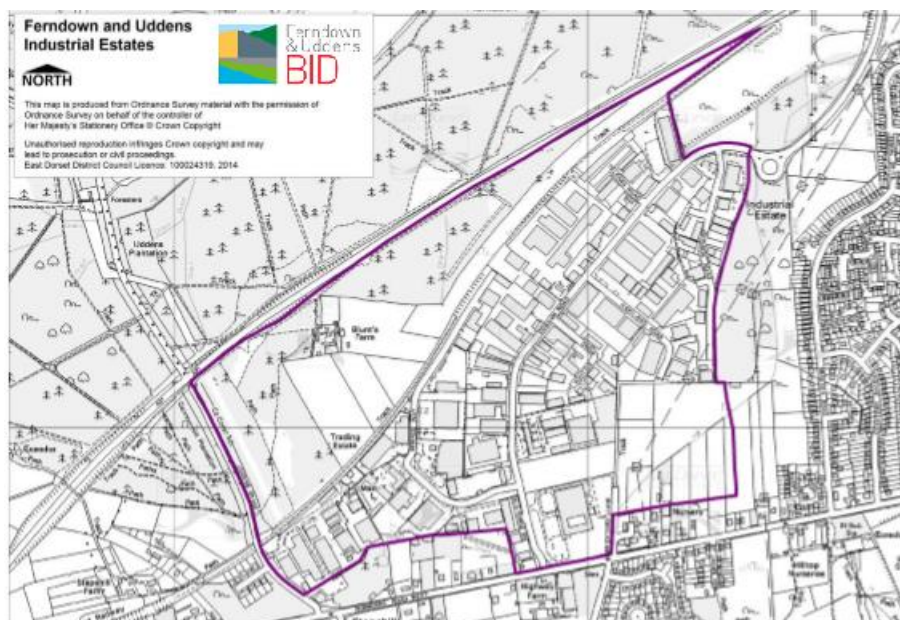


Comments, Support and Objections made by the Ferndown & Uddens Business Improvement District on the Dorset Council Local Plan consultation 2021-2038

1. Introduction

1.1 The Ferndown & Uddens Business Improvement District (BID) was duly constituted under the Local Government Act 2003 following a ballot of businesses on the estate held by East Dorset District Council, the then District local authority for the area. This first five year term of the BID ended at the end of August 2019 to be followed by a second term commencing 1st September 2019. This second term was authorised by a ballot of the 352 levypayering businesses administered by Dorset Council and its agents.

1.2 The BID represents all 450 plus businesses (including the approx. 100 businesses that are exempt from the levy by reason of their size) in the designated area that covers both industrial estates including the Cobham Gate and Blunts Farm allocated development sites as shown in the map below.



The purpose of the BID is set out in its Business Plan 2019-2024. Its vision is “to continuously improve the trading and working environment on the Estates, so that it is a great and safe place to do business and to work”.

The considerations and comments made are restricted to those policies and proposals that directly affect the actions of the BID and the interests of the businesses that it represents. It should be stated that the consultation is comprehensive but rather difficult for the

untrained to follow. The inter connectivity of policies and proposals including those for Blunts Farm, Ferndown make it impossible to effectively separate comments through the online portal. As a result this single document has been prepared to reflect the BID Boards comments.

2 Local Plan Strategy (Vol 1)

2.1 The BID supports the strategic approach set out in paragraph 1.1.13 (page3) that “A key element of the use and development of land relates to economic growth and the provision of job opportunities for residents.”

2.2 The support also includes paragraph 1.3.23 (page12) that recognises the need to provide good quality, higher value jobs to raise the areas lagging GVA. The allocation and development of modern attractive employment sites is an important element to achieve this strategic ambition.

2.3 However this approach fails to recognise the importance of the Blunts Farm and Cobham Gate employment allocations in meeting this strategic objective. The significance of this 30 hectare site which provides access onto the A31 had been identified in the East Dorset Local Plan Review Options Consideration July 2018 (Draft Policy 5.18 p173). An earlier consideration of part of the allocation as a Gypsy and Traveller site was rejected as the need for such a site was not proven and the likely detrimental effect upon the likelihood of the site to attract the sort of quality employment opportunities required to achieve the economic objectives of the plan.

2.4 The Vision as set out in page 16 is agreed especially concerning the development of excellent employment opportunities: “The main centres for economic activity of south east Dorset and the Dorchester to Weymouth corridor will be enhanced. Excellent employment opportunities will exist at the towns with sustainable travel opportunities provided to them from the surrounding villages.

2.5 This Economy strategic priority set out in page 17 which continues the theme of the importance of high quality jobs were it states “We will deliver sustainable economic growth and improved infrastructure across the whole of Dorset, increasing productivity and the number of high quality jobs, and creating great places to live, work and visit.” is also agreed.

2.6 The requirement set out in DEV 1 (page 20) for a minimum of 131 hectares of employment land is recognised.

2.7 The identification of the existence of the South East Dorset Functional Area is accepted as the sensible basis for planning for this area. However the recognition of that functional area lead to the need for a single planning document covering the whole of the functional area including Bournemouth, Christchurch and Poole. This had previously been the basis of planning for the conurbation under the South East Dorset Structure Plan. **The BID therefore objects to the strategic approach of this local plan that fails to allow proper consideration and examination of the key uses of land such as housing, including Gypsy and Traveller site requirement and employment.**

3. Chapter 7: South Eastern Dorset Functional Area

3.1 As stated in 2.7 above the BID objects to the consideration of the land allocations in this functional area without inclusion and consideration and examination of the Bournemouth, Christchurch and Poole area.

3.2 The BID objects to the review of the Green Belt in section 2.6 (from page 29) and DEV2: Growth in the south eastern Dorset functional area (page 31) X. the release of green belt land to the southwest of Ferndown; as the need for this 2 hectare allocation is not required without the attempt to reduce the existing 30 hectare allocation by an erroneous "mixed use" suggestion of including a 2 hectare Gypsy and Traveller site. The need for a Gypsy and Traveller site is not proven but even if it were the more honest approach would be to consider that as an argument for taking land out of the Green Belt so that it could be considered on its merits under prevailing Planning Guidance and advice rather than the less than honest wheeze that is being propagated.

3.3 The BID agrees with the Vision for the Ferndown area set out in 11.2.1 on pages 41 and 42 in particular that "Ferndown will be a place where people and businesses want to locate and grow."

3.4 The identification for the whole of the 30 hectare Blunts Farms employment site in paragraph 11.3.2 along with the 8.5 hectare Cobham Gate employment site is agreed. Both sites fall within the Ferndown & Uddens BID area. There is no explanation why the Blunts Farm allocation is shown in Figure 7.3 – "Housing and employment land allocations in the South Eastern Dorset Functional Area" may be reduced down to as little as 9.0 hectares although the higher figure is still included in the total. The cynic might say that this is part of the wheeze to allow a much larger Traveller development without needing to justify the principle of such an expansion. The BID objects to the suggestion that the Blunts Farm employment site should be reduced from its 30 hectare allocation as this reduces the ability of local businesses to grow and provide additional jobs in their location of choice.

3.5 The BID objects to policy FERN8: Blunts Farm employment allocation, Ferndown only in so much as it assumes the need for "retention of a buffer around the proposed Traveller site to protect the amenity of future occupants." It is noted that the proposal is for a Traveller site only. Elsewhere at paragraph 11.5.28 (page 56) it states "Part of the allocation is being proposed as a site to accommodate Gypsies and Travellers under Policy HOUS11" and under the housing policy it proposes a mixed use. This whole suggestion is erroneous, not well thought through and should be rejected for the reasons set out under the comments on the housing policy section below.

3.6 The BID objects to suggestion that part of the 30 hectare allocation should be used for a Traveller site as it would be contrary and harmful to the main purpose of the employment allocation at Blunts Farm.

3.7 The Plan underplays the importance and significance of the existing Ferndown & Uddens estates and the role the new allocation at Blunts Farm can play in achieving the high value

jobs required by the vision and strategy for economic growth. In 7.3.5 the plan noticeably fails to identify the importance of the Blunts Farm and Cobham Gate allocations instead choosing to focus on the Dorset Innovation Park and sites within Bournemouth, Christchurch and Poole. While the Dorset Innovation Park represents a further chance to kickstart this development in a relatively isolated location reflecting its historical use which has been promoted under various guises since the 1980's the plan fails to recognise the advantages of the successful site in Ferndown.

3.8 Ferndown and Uddens is the largest industrial development in Dorset as is recognised in paragraph 11.1.5 (page 41). It is sited close to the centre of the conurbation with direct access to the A31 and motorways to the South East and Midlands is recognised as the location of choice for the local business sector. The proposals included in the Transforming Cities Fund projects will further enhance access to the industrial estates from across the conurbation.

3.9 The estates currently provide higher than average GVA employment. They have a considerably higher than average proportion of manufacturing and engineering businesses including major high end international companies such as Ultra, Caterpillar, Superior and Farrow & Ball. The Blunts Farm site is ideally suited to provide additional space to facilitate both the growth of these businesses and the attraction of new businesses offering quality employment. The suggestion to allocate part of the site for a Traveller site, even with a protective buffer would significantly threaten the plans underlying proposal for enhanced economic growth through the provision of more quality jobs. The reality of the relative importance of the strategic approach to change the local economy has already been recognised during the East Dorset Local Plan Consultation 2018.

3.19 As reflected in 3.2 above the BID objects to the proposal FERN10: Land west and south of Longham Roundabouts. There is no need or justification for this tiny site to be taken out of the Green Belt and developed in isolation. The employment provision is better made by the development of the whole of the 30 hectare employment site at Blunts Farm rather than threatening its ability to provide the quality employment provided by identifying some spurious mixed use including a Traveller site.

4. Section 4: Housing - 4.11. Gypsies, Travellers and travelling showpeople

4.1 the BID objects to policy HOUS10: The requirement for traveller sites in so much that it includes provision for 31 pitches for 'Travellers who are excluded from the planning definition'. It believes that provision should be made for Gypsy's and Travellers included within the planning definition only.

4.2 The BID objects to the approach adopted in developing this part of the plan. In particular the Gypsy and Traveller Accommodation Assessment (GTAA) undertaken in 2017 cannot be interrogated as it is not included in the plans evidence base. If the figures from the 2017 assessment of need are to be used they should follow the same approach concluded in the East Dorset Local plan consultation 2018 that the assessment did not require the inclusion of the Blunts Farm site. It is noted that a Housing Needs of Specific Groups Assessment is

planned for future work to provide evidence for this plan. If this work includes an assessment of Gypsy and Traveller needs the BID believes this work is properly undertaken for the conurbation together with any sites appraisal before considering specific allocations. The failure to provide any evidence supporting policies HOUS10 and 12 indicates an over simplistic reliance on the first draft East Dorset Plan proposal before it was assessed and rejected in 2018.

4.3 It also objects to the consideration of need in any other way than for the functional area as a whole. The assessment made in 4.11.8. that “At the point of preparing this consultation document for the local plan, no neighbouring councils have identified an unmet need for Traveller accommodation from their areas.” Re enforces the need for a more comprehensive approach. Empirical evidence of unauthorised traveller encampment suggests that the demand for such sites are within the core of the conurbation. It is recognised that these sites are difficult to allocate but it is the BID’s view that they should be considered strategically through a properly constituted study involving the main urban areas.

4.4 When considering the suitability of such sites the BID believes that the criteria included in 4.11.11. should also include the necessity “not to threaten the desired outcomes of strategic objectives through the development of allocated sites.” It also believes that the consideration of “the need to ensure that development in the Green Belt is in accordance with national policy.” Includes consideration and assessment of allocations in the Green Belt to make up for losses as a result of the allocation of Gypsy and Traveller sites elsewhere as the case with employment proposal FERN10: Land west and south of Longham Roundabouts.

4.5 The proposal identified in 4.11.16. “The proposed allocations make provision for:

- around 57 pitches for Gypsies and Travellers;
- around 5 plots for Travelling Showpeople;
- around 31 pitches for ‘Travellers who are excluded from the planning definition’; and
- a transit site with capacity for 25 pitches.”

Is inconsistent with Policy HOUS10 that identifies the need for 20 pitches for Gypsies and Travellers.

4.6 The BID objects to policy HOUS12: Gypsy, Traveller and Travelling Showpeople site allocation as it believes the whole of the employment site at Blunts Farm must be used for employment purposes to ensure its development meets its strategic objective. It should also be noted that Blunts Farm is located within Ferndown and not Wimborne. The Council is given the benefit of the doubt that this description is an error not an attempt to deceive.

4.7 The BID also believes that policy HOUS13: Gypsy, Traveller and Travelling Showpeople site allocations, which concern sites that are not allocated should include the same clause as proposed for 4.11.11. namely the necessity “not to threaten the desired outcomes of strategic objectives through the development of allocated sites.”

4.8 The BID objects to Figure 4.5: List of potential sites for Gypsy, Travellers and Travelling Showpeople in respect of GT/WIMI/002 Blunts Farm, Wimborne (Ferndown not Wimborne). Under the Key Development Consideration for this site it states “Availability - subject to meeting employment land requirements (currently allocated for B1,B2 and B8 uses), may be suitable for mixed G+T/employment development (neighbouring uses would need to be compatible with one another)”

4.9 a) Firstly the need to for the Blunts Farm site to meet its employment land requirement should be assessed before any alternative allocation not after. For the reasons set out above the BID continues to support the development of the whole 30 hectare site for employment uses providing quality job opportunities within the location of choice for businesses.

b) Second the suggestion that the proposed use is a mixed use is erroneous. While there is no standard definition of mixed use it is generally accepted to be used to describe complementary uses which together provide opportunities for a greater value more sustainable form of development. This can include such benefits as supporting more sustainable forms of travel. The proposal to utilise part of this important employment for a Gypsy and Traveller site does not meet any of these criteria. In fact one of the essential features of the development that there must be a buffer between them clearly shows that they are not compatible together and need to have a physical separation. It is also likely that the sites would need to have separate access arrangements.

c) Thirdly the uses are not compatible as the practical commercial effect of the allocation would be to threaten the achievement of the strategic purpose of the allocation to attract and facilitate quality employment providing high value jobs that would help raise the areas GVA.

d) There is a mistrust of the Councils intention behind the suggestion that this is a genuine description of a mixed use in planning terms together with the allocation of FERN 10 which would make up for the lost employment land at Blunts Farm. It is thought this is a wheeze using planning terminology to enable a larger Gypsy and Traveller development than that identified.

4.10 A separate allocation for a Gypsy and Traveller site would be more honest and allow for a distinct assessment of the proposal.

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